



Ag & Business Legal Strategies

INVOICE

PO Box 11425
Cedar Rapids, IA 52410
Phone: (319) 363-1641
Fax: (319) 200-2059
Email: billing@ablsonline.com

Invoice # 2512
Date: 10/24/2023
Due Upon Receipt

BDC Group Inc.
1525 Ketelsen Dr
Hiawatha, IA 52233

6394.00002-BDC - Postpetition

Services

Date	Notes	Attorney	Quantity	Rate	Total
07/10/2023	Update Certificate of Service, Change of Address, and Creditor Mailing List in regards to the returned mail from multiple creditors.	AT	0.20	\$170.00	\$34.00
07/11/2023	Update Certificate of Service, Change of Address, and Creditor Mailing List in regards to the returned mail from multiple creditors.	AT	0.40	\$170.00	\$68.00
07/17/2023	Update Certificate of Service, Change of Address, and Creditor Mailing List in regards to the returned mail from multiple creditors.	AT	0.10	\$170.00	\$17.00
07/17/2023	Update Certificate of Service, Change of Address, and Creditor Mailing List in regards to the returned mail from multiple creditors.	AT	0.20	\$170.00	\$34.00
07/17/2023	Update Certificate of Service, Change of Address, and Creditor Mailing List in regards to the returned mail from multiple creditors.	AT	0.20	\$170.00	\$34.00
08/01/2023	Participate in hearing on DIP Financing and Application to Employ Counsel. (No Charge).	JP	1.00	\$0.00	\$0.00
08/11/2023	Review Deere's proofs of claims to analyze its stated collateral values and the loan terms for all of the current loans.	AP	0.40	\$350.00	\$140.00

08/11/2023	Respond to Deere's counsel's email discussing adequate protection request, whether Deere's claims are fully secured, status of insurance payout, and possible plan treatment.	AP	0.40	\$350.00	\$140.00
08/11/2023	Email to client's principals discussing insurance payout on Deere's stolen collateral, lifting the stay on Virginia equipment (particularly Deere's collateral), and proposal for adequate protection and plan treatment for Deere.	AP	0.60	\$350.00	\$210.00
08/11/2023	Email to Attorney Joe Peiffer outlining proposed negotiation strategy for Deere and requesting his advice.	AP	0.20	\$350.00	\$70.00
08/11/2023	Review Manchester Leasing's attorney's proposal for addressing his client's leased property and collateral and forward to client's principals with commentary.	AP	0.20	\$350.00	\$70.00
08/11/2023	Respond to Unsecured Creditors Committee counsel's email discussing applying prepetition receivables to prepetition debts, lifting stay to dispose of assets, and timeline on getting a new DIP budget.	AP	0.10	\$350.00	\$35.00
08/11/2023	Call with Unsecured Creditors Committee's attorney discussing Deere's stay relief motion and request for adequate protection, Manchester Leasing's motion to assume or reject and proposal, disposition of creditors' collateral, and expectations for tasks for next week.	AP	0.40	\$350.00	\$140.00
08/11/2023	Draft ABL's First Interim BDC Fee App, Notice of same, and Proposed Order granting same. Send to Attorney Austin Peiffer for review.	MP	0.30	\$170.00	\$51.00
08/11/2023	Draft answer & resistance to Deere's stay relief & adequate protection motions.	AP	0.50	\$350.00	\$175.00
08/14/2023	Email Todd Shores to advise that the July MOR will be due next week. (No Charge).	LW	0.10	\$0.00	\$0.00
08/14/2023	Draft Fee Application for EMA (Debtor's appraiser) and send to Attorney Austin Peiffer for review.	MP	0.30	\$170.00	\$51.00
08/14/2023	Email to Isotropic's attorney discussing payments his client made and payments my client made to subcontractors.	AP	0.30	\$350.00	\$105.00
08/14/2023	Review, edit, and approve appraiser's fee application and related documents.	AP	0.10	\$350.00	\$35.00
08/14/2023	Respond to client's principal's email discussing Manchester notice of motion sent to entire mailing matrix.	AP	0.20	\$350.00	\$70.00
08/14/2023	Email to client's principals discussing Isotropic's information demand and deposition scheduling.	AP	0.20	\$350.00	\$70.00
08/15/2023	Email attorneys to set up meeting for the Lift Stay Motion per Attorney Austin Peiffer's request.	AT	0.10	\$170.00	\$17.00
08/15/2023	Review, edit, and approve bill for Ag & Business Legal Strategies' first interim fee application.	AP	0.80	\$350.00	\$280.00

08/15/2023	Meeting with client's principals and Attorney Joe Peiffer (part of the time) discussing Isotropic's information requests and deposition scheduling, Deere's collateral and insurance proceeds, reorganization plan drafting and timeline, Manchester Leasing's proposal for resuming lease payments, and general case status.	AP	1.20	\$350.00	\$420.00
08/15/2023	Prepare letter and check re John Deere/BDC to be mailed to Wes Huisinga. (No Charge).	LW	0.20	\$0.00	\$0.00
08/15/2023	Review client file and send email to Dennis and Todd attaching list of insured vehicles and equipment, with request for them to indicate which items were owned as of filing date - 6/13/2023.	YH	0.20	\$405.00	\$81.00
08/15/2023	Teams meeting with Austin Peiffer to discuss whether amending Schedules is time-sensitive, scope of likely additional amendments, and preparing concurrently with Chapter 11 Plan.	YH	0.20	\$405.00	\$81.00
08/15/2023	Teams meeting with Yara Halloush to discuss whether amending Schedules is time-sensitive, scope of likely additional amendments, and preparing concurrently with Chapter 11 Plan. (No Charge).	AP	0.20	\$0.00	\$0.00
08/15/2023	Review BMO Harris lease rejection notice, Local Rule 6004-1, and 11 U.S.C. § 365, and send emails to BMO's attorney and Ag & Business Legal Strategies staff approving the lease rejection notice and requesting it be filed.	AP	0.20	\$350.00	\$70.00
08/15/2023	Email to client's principal discussing Deere's collateral and requesting authorization to propose settlement for its stay relief motion.	AP	0.10	\$350.00	\$35.00
08/15/2023	Update Notice of ABL's 1st fee app to include hearing date and time.	MP	0.10	\$170.00	\$17.00
08/15/2023	Draft proposed consent order lifting stay and establishing adequate protection for Deere. Send to Attorney Austin Peiffer for review.	MP	0.20	\$170.00	\$34.00
08/15/2023	Organize all of the Isotropic Invoices into a spreadsheet per Attorney Austin Peiffer's request.	AT	0.80	\$170.00	\$136.00
08/15/2023	Review, edit, and circulate proposed order to resolve Deere's stay relief motion.	AP	0.40	\$350.00	\$140.00
08/15/2023	Meet with Dennis Bruce, Todd Shores and Austin Peiffer regarding Isotropic, and potential plan treatment of creditors. (No Charge).	JP	0.50	\$0.00	\$0.00
08/15/2023	Draft letter to Wes Huisinga regarding payment on claim for stolen equipment.	JP	0.20	\$575.00	\$115.00
08/15/2023	Draft e-mails to True North regarding missing check for stolen trailer.	JP	0.20	\$575.00	\$115.00
08/15/2023	Telephone calls to Wes Huisinga regarding check for stolen	JP	0.10	\$575.00	\$57.50

	excavator and inquiries regarding the check for the stolen trailer.				
08/16/2023	Update Certificate of Service, Change of Address, and Creditor Mailing List in regards to the returned mail from multiple creditors.	AT	0.80	\$170.00	\$136.00
08/16/2023	Respond to and address Comstar Supply's email about scheduled debt.	AP	0.10	\$350.00	\$35.00
08/16/2023	Emails to client's principal and Isotropic's counsel discussing consensual 2004 examination.	AP	0.10	\$350.00	\$35.00
08/16/2023	Respond to unsecured creditors committee's attorney's comments on the proposed consent order to resolve Deere's stay relief motion.	AP	0.20	\$350.00	\$70.00
08/16/2023	Review newest budget variance report and forward to counsel for Keystone Savings Bank and the unsecured creditors committee for their review and to use for next interim DIP order.	AP	0.10	\$350.00	\$35.00
08/16/2023	Teleconference with attorneys for Deere, Keystone Savings Bank, and the unsecured creditors committee discussing consent order to resolve Deere's stay lift motion.	AP	0.80	\$350.00	\$280.00
08/16/2023	Update Certificate of Service, Change of Address, and Creditor Mailing List in regards to the returned mail from multiple creditors.	AT	0.40	\$170.00	\$68.00
08/16/2023	Call with ECICOG's attorney discussing consensual stay relief for its collateral that client no longer needs.	AP	0.20	\$350.00	\$70.00
08/16/2023	Forward and reply to unsecured creditors committee's attorney's email inquiring about sources of budget variances and projections going forward.	AP	0.10	\$350.00	\$35.00
08/16/2023	Draft the Notice of Lease Rejection and Opportunity to Object per Attorney Austin Peiffer's request.	AT	0.50	\$170.00	\$85.00
08/16/2023	Complete review of bill for Ag & Business Legal Strategies' first fee application.	AP	0.70	\$350.00	\$245.00
08/16/2023	Take call from Ditch Witch of Virginia discussing Manchester Leasing's demand letter and how it is affecting prospects Ditch Witch of Virginia might purchase client's Ditch Witch equipment from client's secured creditors.	AP	0.20	\$350.00	\$70.00
08/16/2023	Review, edit, and approve fee application and corresponding notice.	AP	0.30	\$350.00	\$105.00
08/17/2023	Case status update meeting with client's principals, Keystone Savings Bank representative, and Attorney Joe Peiffer discussing reaching out to potential collateral purchasers, addressing Keystone Savings Bank's claims within the bankruptcy and post-petition, and resolving Deere's stay relief motion.	AP	0.60	\$350.00	\$210.00

08/17/2023	Meeting with BDC representatives Dennis Bruce, Todd Shores, and KSB loan officer Travis Armstrong and Austin Peiffer to discuss case.	JP	0.50	\$575.00	\$287.50
08/17/2023	Telephone call from Abram Carls regarding status of case; Manchester Leasing frustration of trading of its leased machine by Debtor; discussion of Adequate Protection Payments for Deere and assumption of leases with Manchester Leasing; discussion of Unsecured Creditor's Committee objection to making payment to Keystone Savings Bank from pre-petition receivables.	JP	0.20	\$575.00	\$115.00
08/17/2023	Review revisions to consent order resolving Deere's stay relief motion and associated correspondence and reply with comments and discussion of expected course of this afternoon's hearing.	AP	0.20	\$350.00	\$70.00
08/17/2023	Finalize First Interim Fee Application for Debtor's Counsel and prepare for filing.	LW	0.20	\$170.00	\$34.00
08/17/2023	Finalize the draft of the Notice of First Interim Application for Compensation for Debtor's Attorney.	AT	0.30	\$170.00	\$51.00
08/17/2023	Review, edit, and approve BMO lease rejection notice.	AP	0.10	\$350.00	\$35.00
08/17/2023	Finalize the Notice of Lease Rejection and Opportunity to Object.	AT	0.10	\$170.00	\$17.00
08/17/2023	Submit Notice of First Interim Application for Compensation for Debtor's Attorney and Notice of Lease Rejection and Opportunity to Object to CertificateofService.com to be mailed to the Master Service List. (No Charge).	LW	0.30	\$0.00	\$0.00
08/17/2023	Review spreadsheet of schedule information, sketch out plan treatment for secured creditors, begin determining whether to assume or reject executory contracts, and draft instructions for paralegal to complete parts of review.	AP	0.60	\$350.00	\$210.00
08/17/2023	Work on Chapter 11 plan of reorganization to classify creditors and consider liquidation analysis.	JP	1.00	\$575.00	\$575.00
08/17/2023	Represent client in preliminary hearing on Deere's stay relief motion.	AP	0.40	\$350.00	\$140.00
08/17/2023	Work on cross referencing Schedule E information with Prepetition Wages list.	AT	0.70	\$170.00	\$119.00
08/17/2023	Review Isotropic invoices client has submitted, cross-reference with client's analysis of Isotropic jobs, edit invoice summary sheet, resolve discrepancy in invoice summary sheet, and email client question about remaining discrepancy between invoices and analysis.	AP	1.00	\$350.00	\$350.00
08/18/2023	Teams meeting with Austin to discuss plan of action with sending Isotropic Invoices to Terry Gibson.	AT	0.10	\$170.00	\$17.00
08/18/2023	Meeting with Alex Tvedte discussing producing documents	AP	0.10	\$350.00	\$35.00

	and information to Isotropic.				
08/18/2023	Draft email to Isotropic's attorney to accompany document production and send to Alex Tvedte.	AP	0.20	\$350.00	\$70.00
08/18/2023	Compile Isotropic invoice documents required to email to Terry Gibson.	AT	0.50	\$170.00	\$85.00
08/18/2023	Email Terry Gibson the Isotropic Invoices for Ne and NM as well as the ABLIS Invoice spreadsheet and the BDC Analysis.	AT	0.20	\$170.00	\$34.00
08/18/2023	Draft proposed third order extending interim DIP financing order.	AP	0.20	\$350.00	\$70.00
08/18/2023	Work on Schedules D and G, specifically cross-referencing the Manchester Leasing agreements with the current information in our Schedules.	AT	1.20	\$170.00	\$204.00
08/18/2023	Email to counsel for Unsecured Creditors Committee and Keystone Savings Bank with proposed third interim DIP extension order, responding to questions about vehicles, and answering questions about budget projections.	AP	0.60	\$350.00	\$210.00
08/18/2023	Respond to Comstar Supply's inquiry about its claim amount.	AP	0.10	\$350.00	\$35.00
08/18/2023	Review and edit consent order granting Deere's stay relief and adequate protection motion, including cross-referencing Virginia equipment schedule with client's records.	AP	0.70	\$350.00	\$245.00
08/18/2023	Teams call with Austin to discuss steps to move forward on Schedules D and G.	AT	0.30	\$170.00	\$51.00
08/18/2023	Email to client's principals discussing postpetition profitability and new DIP budget.	AP	0.10	\$350.00	\$35.00
08/18/2023	Draft answer & resistance to Manchester Leasing's motion for stay relief or adequate protection.	AP	0.10	\$350.00	\$35.00
08/18/2023	File Answer & Resistance to Manchester's Stay Relief & Adequate Protection Motion. (No Charge)	AT	0.20	\$0.00	\$0.00
08/18/2023	Email to opposing counsel with latest versions of Deere consent order and equipment schedule and discussion of obtaining the United States Trustee's consent and resolving insurance questions.	AP	0.30	\$350.00	\$105.00
08/18/2023	Meeting with Alex Tvedte discussing tasks for editing plan preparation spreadsheet. (No Charge).	AP	0.30	\$0.00	\$0.00
08/18/2023	Email to Keystone Savings Bank's attorney discussing stay relief on Virginia collateral.	AP	0.10	\$350.00	\$35.00
08/21/2023	Review & edit Isotropic's proposed consent 2004 motion.	AP	0.30	\$350.00	\$105.00
08/21/2023	Email to client's principals outlining Isotropic's document	AP	0.20	\$350.00	\$70.00

	requests for 2004 examination with commentary about what seems reasonable and unreasonable given the time constraints.				
08/21/2023	Review and approve latest revised Deere consent order and collateral spreadsheet.	AP	0.10	\$350.00	\$35.00
08/21/2023	Edit proposed consent motion and consent order for Isotropic 2004 examination and send to Isotropic's counsel for final approval and filing.	AP	0.20	\$350.00	\$70.00
08/21/2023	Respond to ECICOG's attorney's request for unredacted appraisal.	AP	0.10	\$350.00	\$35.00
08/21/2023	Compile draft and email BDC Bank Statements to Terry Gibson.	AT	0.70	\$170.00	\$119.00
08/21/2023	Meeting with Attorney Joe Peiffer discussing current case status and tasks, including responding to client's emailed concerns, dealing with prepetition receivables, reviewing POCs, drafting plan classification, drafting terms sheet, dealing with Keystone Savings Bank debt postpetition, accountant's prepetition bill, and getting remaining Virginia equipment removed.	AP	0.50	\$350.00	\$175.00
08/21/2023	Follow up with client's CFO about July monthly report.	AP	0.10	\$350.00	\$35.00
08/21/2023	Email to United States Trustee's office discussing July monthly report filing timeline.	AP	0.10	\$350.00	\$35.00
08/21/2023	Evaluate what Virginia collateral might have equity for Keystone Savings Bank and for what collateral client needs to contact the PMSI creditor to arrange a consensual stay relief motion.	AP	1.00	\$350.00	\$350.00
08/21/2023	Compile and save documents from client to NetDocuments. (No Charge)	AT	0.10	\$0.00	\$0.00
08/21/2023	Email a copy of the unredacted Appraisal to Rush Shortley and Robyn Jacobson of ECICOG.	AT	0.20	\$170.00	\$34.00
08/21/2023	Email to Caterpillar's attorney discussing consensual stay relief for Virginia equipment.	AP	0.30	\$350.00	\$105.00
08/22/2023	Respond to email from Keystone Savings Bank's counsel discussing Isotropic Rule 2004 examination.	AP	0.10	\$350.00	\$35.00
08/22/2023	Email and message in response to Caterpillar's attorney's agreement to pursue consensual stay relief for the Virginia collateral.	AP	0.10	\$350.00	\$35.00
08/22/2023	Download monthly report documents from client and save them to ND. (No Charge)	AT	0.10	\$0.00	\$0.00
08/22/2023	Email to GreenState Credit Union's attorney discussing collateral in Virginia and consensually lifting the stay.	AP	0.20	\$350.00	\$70.00
08/22/2023	Draft MTLs and Proposed Order for Caterpillar equipment	MP	0.60	\$170.00	\$102.00

in VA. Send to Attorney Austin Peiffer for review.					
08/22/2023	Download Monthly Report documents from clients and save to ND. (No Charge)	AT	0.10	\$0.00	\$0.00
08/22/2023	Email to client's principals discussing GreenState Credit Union request for collateral locations.	AP	0.20	\$350.00	\$70.00
08/22/2023	Draft e-mail to Janet Reasoner regarding payment of Bergan KDV prepetition fees.	JP	0.10	\$575.00	\$57.50
08/22/2023	Telephone call to Nema Falahpour of Bergan KDV regarding payment of pre-petition fees and WIP so Bergan KDV can be appointed as accountant.	JP	0.10	\$575.00	\$57.50
08/22/2023	Receive email from Austin Peiffer attaching documentary support for position that two Trail King trailers are owned by Caterpillar and only leased by BDC Group, Inc; Update Schedules and SOFA accordingly. Half-rate.	YH	0.40	\$202.50	\$81.00
08/22/2023	Draft Amendment to Application to Employ Accountant to deal with payment by ABLs to accountant.	JP	0.30	\$575.00	\$172.50
08/22/2023	Compile and redact all the July MOR documents.	AT	1.80	\$170.00	\$306.00
08/22/2023	Participate in Teams meeting with Austin Peiffer to discuss scope and timing of proposed amendments to Bankruptcy Schedules and Statement of Financial Affairs.	YH	0.30	\$405.00	\$121.50
08/22/2023	Participate in Teams meeting with Yara Halloush to discuss scope and timing of proposed amendments to Bankruptcy Schedules and Statement of Financial Affairs. (No Charge).	AP	0.30	\$0.00	\$0.00
08/22/2023	Call with Alex Tvedte discussing what information to include in monthly report.	AP	0.10	\$350.00	\$35.00
08/22/2023	Review Attorney Austin Peiffer's emails and isolate things to be updated on BDC Schedules. Add information as able to schedules in BestCase.	MP	0.30	\$170.00	\$51.00
08/22/2023	Draft Notice of Rejection of NinjaOne Contract and Opportunity to Object.	LW	0.20	\$170.00	\$34.00
08/22/2023	Email drafted Notice of Rejection of NinjaOne Contract and Opportunity to Object to Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
08/22/2023	Review, edit, and approve consensual Caterpillar stay relief motion and proposed order.	AP	0.20	\$350.00	\$70.00
08/22/2023	Locate Jan-Jun 2023 KSB Statements, Bates Number them and send to Terry Gibson for review.	MP	0.10	\$170.00	\$17.00
08/22/2023	Proofread and finalize MTLs for Caterpillar and Proposed Order for same. Circulate to Abram Carls, Elizabeth Janczak, and Mark Ludolph for review and approval.	MP	0.20	\$170.00	\$34.00
08/22/2023	Return phone call to Jeff Goetz regarding his representation	MP	0.10	\$170.00	\$17.00

	of RP Construction, progression of case and plan propagation. Draft follow up email re same.				
08/22/2023	Updated drafted Amendment to Application to Employ Accountant as outlined by Attorney Joseph Peiffer.	LW	0.20	\$170.00	\$34.00
08/22/2023	Update drafted Proposed Order Granting Application to Employ Accountant to include information from the drafted Amendment.	LW	0.10	\$170.00	\$17.00
08/22/2023	Email drafted Amendment to Application to Employ Accountant and corresponding proposed order to Attorney Joseph Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
08/22/2023	Work on schedules A/B by cross-referencing information from spreadsheets as well as what is already in Best Case. (No Charge).	AT	2.10	\$0.00	\$0.00
08/22/2023	Review and edit notice of motion to reject NinjaOne executory contract.	AP	0.10	\$350.00	\$35.00
08/22/2023	Research and sketch out motion to reject executory contract, and send to Leah Watson to finish drafting.	AP	0.20	\$350.00	\$70.00
08/23/2023	Email to and meeting with Alex Tvedte discussing how to reconcile proofs of claim with the schedules.	AP	0.30	\$350.00	\$105.00
08/23/2023	Draft a schedule spreadsheet comparing debts from schedules and the filed proof of claims.	AT	3.80	\$170.00	\$646.00
08/23/2023	Attend Isotropic 2004 examination.	AP	2.60	\$350.00	\$910.00
08/23/2023	Draft Motion to Reject Executory Contract.	LW	0.10	\$170.00	\$17.00
08/23/2023	Update drafted Notice of Rejection of NinjaOne Contract to reflect that a Motion to Reject the contract has been filed.	LW	0.10	\$170.00	\$17.00
08/23/2023	Email drafted Motion to Reject Executory Contract with NinjaOne and corresponding Notice to Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
08/23/2023	Draft e-mails to Wes Huisinga, Dennis Bruce and Todd Shores regarding providing address to Deere so it can pick up its equipment in Virginia.	JP	0.20	\$575.00	\$115.00
08/23/2023	Telephone call to Rush Shortley regarding contact person for finalizing Consent Order Lifting Stay for ECICOG to pick up its equipment.	JP	0.10	\$575.00	\$57.50
08/23/2023	Travel to and from Isotropic 2004 examination.	AP	0.80	\$350.00	\$280.00
08/23/2023	Revise Order Granting Application to Employ Accountant.	JP	0.20	\$575.00	\$115.00
08/23/2023	Draft e-mails to Accountant and its in house counsel regarding finalization of the employment of Creative Planning Tax, LLC as Accountant for BDC Group, Inc.	JP	0.20	\$575.00	\$115.00
08/23/2023	Scan, OCR, rename, and upload exhibits from Isotropic's	LW	0.50	\$0.00	\$0.00

Rule 2004 Exam to NetDocuments. (No Charge).					
08/23/2023	Draft e-mails to client and Wes Huisinga regarding the location of Deere equipment in Virginia.	JP	0.20	\$575.00	\$115.00
08/23/2023	Return call to Kevin Asehan at True North regarding Deere being listed as loss payee on BDC's equipment and the status of the trailer payment. Draft email to Wes Huisinga regarding same.	MP	0.10	\$170.00	\$17.00
08/23/2023	Review Ditch Witch of Virginia's amended proof of claim.	AP	0.10	\$350.00	\$35.00
08/23/2023	Email to Ditch Witch of Virginia's attorney discussing amended claim and the other apparently unrelated claim it filed in this case.	AP	0.10	\$350.00	\$35.00
08/23/2023	Review motion to reject NinjaOne executory contract and return to Leah Watson for revisions. (No Charge).	AP	0.10	\$0.00	\$0.00
08/23/2023	Receive email from Wes Huisinga regarding whether Deere would be listed on second insurance check as loss payee. Reply that I was assured they were listed on the policy, but was unable to confirm that they would be listed on the check.	MP	0.10	\$170.00	\$17.00
08/23/2023	Email Craig Hilpipre to advise that the bar date for objections to his Application for Compensation is 9/5/23. (No Charge).	LW	0.10	\$0.00	\$0.00
08/24/2023	Meet with Alex to discuss status of the Amendments to Schedules that he has been working on and best options for ensuring that all updated information received from clients is incorporated. Half rate.	YH	0.50	\$202.50	\$101.25
08/24/2023	Amend parts of Schedule A/B to give better clarity of values for specific items in each entry. (No Charge).	AT	0.40	\$0.00	\$0.00
08/25/2023	Create Spreadsheet for all the changes to the schedules that I have made.	AT	0.80	\$170.00	\$136.00
08/25/2023	Meeting with Attorney Joseph Peiffer and Legal Assistant Alex Tvedte regarding sorting emails regarding schedule updates. (No Charge).	LW	0.40	\$0.00	\$0.00
08/25/2023	Meet with staff to finalize schedule amendment process. (No Charge)	JP	0.50	\$0.00	\$0.00
08/25/2023	Respond to client's email discussing Manchester Leasing stay relief hearing today.	AP	0.20	\$350.00	\$70.00
08/25/2023	Email to client's principal distinguishing adequate protection from plan payments and discussing resuming payments on true leases.	AP	0.30	\$350.00	\$105.00
08/25/2023	Forward email regarding Manchester Leasing received from Dennis Bruce to Attorney Austin Peiffer. (No Charge).	LW	0.10	\$0.00	\$0.00
08/25/2023	Phone call with Yara to get her up to date regarding	AT	0.50	\$0.00	\$0.00

schedule prep. (No Charge)					
08/25/2023	Search through all of Attorney Austin Peiffer's emails relating to schedule information. (No Charge)	AT	0.90	\$0.00	\$0.00
08/25/2023	Email to client's principal explaining why prepetition receivables can't be used to pay postpetition expenses.	AP	0.20	\$350.00	\$70.00
08/25/2023	Call with Unsecured Creditors Committee's counsel discussing Manchester Leasing hearing today, upcoming Rule 2004 examination, and plan for a reorganization plan.	AP	0.20	\$350.00	\$70.00
08/25/2023	Respond to Keystone Savings Bank's email discussing applying prepetition receivables to prepetition debts.	AP	0.10	\$350.00	\$35.00
08/25/2023	Preliminary hearing on Manchester Leasing's stay relief motion.	AP	0.20	\$350.00	\$70.00
08/25/2023	Review and locate emails related to schedule amendments and save to a new folder in NetDocuments. (No Charge).	LW	1.20	\$0.00	\$0.00
08/25/2023	Respond to U.S.Bank Equipment Finance's email inquiring about client's leased copiers.	AP	0.20	\$350.00	\$70.00
08/26/2023	Work on drafting plan, including drafting initial plan classification and treatments of secured creditors (1.5 hrs.) assessing secured which creditors are oversecured and undersecured, evaluating security interest priority hierarchies (.8), reviewing secured claims, reviewing loan documents (1.3), evaluating effects of dragnet and anti-cross-collateralization language (1.3), and estimating remaining equity after paying PMSIs (0.6).	AP	5.50	\$350.00	\$1,925.00
08/26/2023	Review 36 Proofs of Claim by Secured Creditors and Leasors to determine whether they are leases or disguised financing devices.	JP	4.50	\$575.00	\$2,587.50
08/26/2023	Meet with Austin Peiffer to discuss plan classification of claims. (No Charge).	JP	1.00	\$0.00	\$0.00
08/26/2023	Review POCs of Unsecured Creditors.	JP	0.60	\$575.00	\$345.00
08/27/2023	Review and locate emails related to schedule amendments and save to a new folder in NetDocuments. (No Charge).	LW	1.90	\$0.00	\$0.00
08/28/2023	Note down high-level ideas about potential avoidance actions.	AP	0.10	\$350.00	\$35.00
08/28/2023	Research effects of dragnet clauses under Article 9 with respect to junior creditors and the effectiveness of cross-collateralization disclaimers.	AP	1.50	\$350.00	\$525.00
08/28/2023	Review and locate emails related to schedule amendments and save to a new folder in NetDocuments. (No Charge).	LW	2.00	\$0.00	\$0.00
08/28/2023	Email Craig Hilpipre to advise that BDC will not be selling the appraised equipment.	LW	0.10	\$170.00	\$17.00

08/29/2023	Review and locate emails related to schedule amendments and save to a new folder in NetDocuments. (No Charge).	LW	2.80	\$0.00	\$0.00
08/29/2023	Cross reference emails and information we have regarding schedule updates with the most recent amended schedules. (No Charge).	LW	0.50	\$0.00	\$0.00
08/29/2023	Update schedules using Craig Hilpipre's Appraisal and the lists provided by BDC Group Inc.'s insurance. (No Charge).	LW	1.70	\$0.00	\$0.00
08/29/2023	Status update email to Attorney Joe Peiffer outlining where case is and current issues with new DIP budget, working with Keystone, Unsecured Creditors Committee's requests for information, and making progress on a plan.	AP	0.60	\$350.00	\$210.00
08/30/2023	Draft answer to questions by Austin Peiffer regarding status of case and moving forward with the plan formulation.	JP	0.30	\$575.00	\$172.50
08/30/2023	Update schedules using Craig Hilpipre's Appraisal, the lists provided by BDC Group Inc.'s insurance, Deere's filed POCs, and information received from clients in emails. (No Charge).	LW	2.80	\$0.00	\$0.00
08/30/2023	Cross reference emails and information we have regarding schedule updates with the most recent amended schedules. (No Charge).	LW	1.50	\$0.00	\$0.00
08/30/2023	Meeting with Attorney Joe Peiffer and client's principals discussing case status, new DIP budget, what a reorganization plan would look like, and other matters. (No Charge).	AP	0.60	\$0.00	\$0.00
08/30/2023	Email Attorney Austin Peiffer to see if Master Service List needs to be updated. (No Charge).	LW	0.10	\$0.00	\$0.00
08/30/2023	Meeting with Austin Peiffer, Dennis Bruce and Todd Shores to discuss DIP; Rule 2004 Exam by Unsecured Creditors and Chapter 11 Plan.	JP	0.50	\$575.00	\$287.50
08/30/2023	Call with Unsecured Creditors Committee's attorney discussing proposed Rule 2004 examination, interim DIP financing and new DIP budget, Ag & Business Legal Strategies' fee application, Manchester Leasing stay relief motion, and plan status.	AP	0.50	\$350.00	\$175.00
08/30/2023	Email to counsel for Keystone Savings Bank and the Unsecured Creditors Committee with client's new proposed DIP budget and comments.	AP	0.30	\$350.00	\$105.00
08/30/2023	Email to Keystone Savings Bank's attorney discussing request to use prepetition accounts receivable to pay postpetition expenses and alternative solution of increasing DIP limit.	AP	0.30	\$350.00	\$105.00
08/31/2023	Update schedules using filed POCs and information received from clients in emails. (No Charge).	LW	1.40	\$0.00	\$0.00
08/31/2023	Cross reference emails and information we have regarding	LW	4.50	\$0.00	\$0.00

	schedule updates with the most recent amended schedules. (No Charge).				
08/31/2023	Status update meeting with client's principals, Attorney Joe Peiffer, and Keystone Savings Bank's representatives discussing DIP borrowing limit issues, plan status, and status of Virginia equipment.	AP	0.60	\$350.00	\$210.00
08/31/2023	Reply to email from ECICOG's attorney discussing soliciting purchase offers for Virginia collateral.	AP	0.10	\$350.00	\$35.00
08/31/2023	Email to client's principals inquiring about consenting to adequate protection for Manchester Leasing.	AP	0.10	\$350.00	\$35.00
08/31/2023	Email to client's principals discussing Unsecured Creditors Committee's concern about revenues.	AP	0.10	\$350.00	\$35.00
08/31/2023	Email to Manchester Leasing's attorney discussing consenting to stay relief.	AP	0.20	\$350.00	\$70.00
08/31/2023	Review emails in my Inbox to identify possible emails sent to me exclusively by Todd Shores and/ or Dennis Bruce, which may include information relevant to updating Schedules. No charge.	YH	0.40	\$0.00	\$0.00
08/31/2023	Review Manchester Leasing's motion to set deadline for lease assumption or rejection and contemplate whether it requires a reponse.	AP	0.10	\$350.00	\$35.00
08/31/2023	Emails to Caterpillar and GreenState's attorneys discussing lifting the stay on Virginia collateral.	AP	0.10	\$350.00	\$35.00
08/31/2023	Receive email from Austin with questions re: whether to object to Manchester Leasing Motion; Review pleading and respond to his query.	YH	0.30	\$405.00	\$121.50
08/31/2023	Meeting with Dennis Bruce, Todd Shores, Banker, Abram Carls and Austin Peiffer to discuss status of plan and payment of DIP loan and increase in DIP borrowing.	JP	0.50	\$575.00	\$287.50
08/31/2023	Email to client's principals discussing recommendation on Manchester Leasing's motion to set deadline to assume or reject leases.	AP	0.20	\$350.00	\$70.00
08/31/2023	Review, edit, and recirculate proposed consent order resolving Manchester Leasing's stay relief motion.	AP	0.20	\$350.00	\$70.00
08/31/2023	Receive 2 emails from Leah Watson with questions about how certain information received from Todd Shores should be listed in Amended Schedules and/or SOFA; Draft email response.	YH	0.40	\$405.00	\$162.00
08/31/2023	Respond to Ditch Witch of Virginia's attorney's email discussing liquidating Virginia equipment.	AP	0.20	\$350.00	\$70.00
08/31/2023	Email to client's principals discussing how to reduce monthly equipment payments and what client will do when Manchester leases expire.	AP	0.10	\$350.00	\$35.00

08/31/2023	Respond to Leah Watson's email discussing whether to amend schedules to increase Sunbeam's claim.	AP	0.10	\$350.00	\$35.00
08/31/2023	Review receivables variances from client's budget and CFO's report of ARs, work awaiting client approval, and work being finished by the end of next week, and draft email to CFO requesting more details about work that has been done but not yet paid for.	AP	0.60	\$350.00	\$210.00
08/31/2023	Begin reviewing plan draft and incorporating plan treatment.	AP	0.90	\$350.00	\$315.00
09/01/2023	Meeting with Attorney Joe Peiffer discussing client's accounts receivable position.	AP	0.10	\$350.00	\$35.00
09/01/2023	Review proposed changes to Manchester Leasing stay relief consent order.	AP	0.50	\$350.00	\$175.00
09/01/2023	Cross reference emails and information we have regarding schedule updates with the most recent amended schedules. (No Charge).	LW	1.50	\$0.00	\$0.00
09/01/2023	Draft Nunc Pro Tunc Order regarding Motion to Pay Prepetition Wages. (No Charge).	AT	0.80	\$0.00	\$0.00
09/01/2023	Update schedules using information received from clients in emails. (No Charge).	LW	0.80	\$0.00	\$0.00
09/01/2023	Represent client in hearing on final DIP order.	AP	1.10	\$350.00	\$385.00
09/01/2023	Update spreadsheet of schedule amendments to include creditor next to items on schedule A/B. (No Charge).	LW	1.00	\$0.00	\$0.00
09/01/2023	Call with ECICOG's attorney discussing and approving consensual stay relief motion & order.	AP	0.20	\$350.00	\$70.00
09/01/2023	Telephone call from Rush Shortley regarding ECIOC Joint Motion to Lift Stay and draft e-mail approving Joint Motion and Consent Order.	JP	0.10	\$575.00	\$57.50
09/01/2023	Research Adversary Proceeding For Injunction against third party lawsuits against Dennis Bruce.	JP	0.50	\$575.00	\$287.50
09/01/2023	Email spreadsheet of schedule amendments to Attorney Joseph Peiffer. (No Charge).	LW	0.10	\$0.00	\$0.00
09/05/2023	Update schedules using information received from clients in emails. (No Charge).	LW	0.50	\$0.00	\$0.00
09/05/2023	Edit plan to incorporate and flesh out classification and treatment.	AP	2.40	\$350.00	\$840.00
09/05/2023	Cross reference emails and information we have regarding schedule updates with the most recent amended schedules. (No Charge).	LW	1.40	\$0.00	\$0.00
09/05/2023	Update schedules in BestCase using spreadsheet of schedule amendments. (No Charge).	LW	3.50	\$0.00	\$0.00

09/05/2023	Work on setting up plan payments for the various creditors of BDC.	JP	1.00	\$575.00	\$575.00
09/05/2023	Finish first-pass review & revision of plan draft.	AP	1.30	\$350.00	\$455.00
09/06/2023	Meeting with Leah Watson and Alex Tvedte reviewing plan preparation documents and Schedule D information to ascertain data accuracy and provenance and assign tasks to prepare information to include in plan treatment.	AP	0.70	\$350.00	\$245.00
09/06/2023	Review and Revise Chapter 11 Plan initially drafted by Austin Peiffer.	JP	0.80	\$575.00	\$460.00
09/06/2023	Update Schedule-D Plan Prep spreadsheet in preparation of filing the Plan.	AT	3.50	\$170.00	\$595.00
09/06/2023	Meeting with Attorney Austin Peiffer and Legal Assistant Alex Tvedte reviewing plan preparation documents and Schedule D information to ascertain data accuracy and provenance and assign tasks to prepare information to include in plan treatment.	LW	0.70	\$170.00	\$119.00
09/06/2023	Compare equipment leases from Schedule G to the Assets and Leasing Tracker Master List for Attorneys to determine which leases BDC intends to keep and which BDC intends to sell.	LW	0.70	\$170.00	\$119.00
09/06/2023	Review base plan feasibility with Austin Peiffer in light of the values added in the amended schedules.	JP	0.30	\$575.00	\$172.50
09/06/2023	Review and Revise 27 page Trust Agreement for Chapter 11 Plan for BDC Group, Inc.	JP	2.20	\$575.00	\$1,265.00
09/06/2023	Remove duplicated entries from BestCase. (No Charge).	LW	0.50	\$0.00	\$0.00
09/06/2023	Shorten descriptions of property on Sch D in BestCase so the full description is visible.	LW	0.70	\$170.00	\$119.00
09/06/2023	Draft spreadsheet calculating monthly plan payments.	AP	0.90	\$350.00	\$315.00
09/06/2023	Email Attorney Austin Peiffer to confirm that Fin & Fern, LLC's claim was added to Schedule F. (No Charge).	LW	0.10	\$0.00	\$0.00
09/06/2023	Arrange meeting with clients to discuss plan.	AP	0.10	\$350.00	\$35.00
09/06/2023	Review and strategize how to effectively present PMSI creditor plan treatment with Attorney Joe Peiffer.	AP	0.50	\$350.00	\$175.00
09/06/2023	For PMSI secured claims add details of claim amount, collateral, collateral value, and collateral surrendered for liquidation.	AP	2.40	\$350.00	\$840.00
09/06/2023	Simplify PMSI creditor classification by combining classes that were previously separated.	AP	0.40	\$350.00	\$140.00
09/06/2023	Revise general treatment types for PMSI secured claims.	AP	0.40	\$350.00	\$140.00
09/06/2023	Edit priority tax claim treatment to charge those claims	AP	0.30	\$350.00	\$105.00

	against the liquidating trust.				
09/06/2023	Draft liquidating trust plan provision and make corresponding edits to later sections of the plan.	AP	0.50	\$350.00	\$175.00
09/06/2023	Proofread and edit Keystone Savings Bank's secured claims' treatments, further simplify PMSI claim classification and delete one type of PMSI claim treatment, and work on classifying Manchester Leasing's proofs of claim.	AP	0.50	\$350.00	\$175.00
09/06/2023	Telephone call from Abram Carls regarding proposed chapter 11 plan; discussion regarding timing of filing of plan; discussion regarding the DIP and paying attorney fees.	JP	0.70	\$575.00	\$402.50
09/07/2023	Meeting with Attorney Joe Peiffer and client's principals discussing plan and secured creditor payments.	AP	0.50	\$350.00	\$175.00
09/07/2023	Meeting with Attorney Joe Peiffer, client's principals, and Keystone Savings Bank discussing plan, DIP budget, increasing the DIP line of credit, and moving forward with the case.	AP	0.60	\$350.00	\$210.00
09/07/2023	Teams meeting with Austin Peiffer, Todd Shores and Dennis Bruce regarding the proposed payments under the Chapter 11 Plan; discussion about the hearing held on September 1, 2023.	JP	0.40	\$575.00	\$230.00
09/07/2023	Meeting with Travis Armstrong and Abram Carls of Keystone Savings Bank; Austin Peiffer, Dennis Bruce and Todd Shores of BDC to discuss the current draft of the plan; DIP Line Increase to \$1,000,000 and pay down on pre-petition loan to Keystone to satisfy the US Trustee.	JP	0.50	\$575.00	\$287.50
09/07/2023	Review and revise Keystone Savings Bank's plan treatment to turn DIP into ongoing line of credit and flesh out repayment of prepetition lines of credit, then send to Keystone Savings Bank's counsel with discussion of changes made and whether the avoidance actions might be available to repay either debt.	AP	0.90	\$350.00	\$315.00
09/07/2023	Draft Notice of Change of Address for BDC Group Inc.	LW	0.10	\$170.00	\$17.00
09/07/2023	Email drafted Notice of Change of Address for BDC Group Inc. to Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
09/07/2023	Call with counsel for the Unsecured Creditors Committee and Keystone Savings Bank discussing extending the interim DIP authorization, final DIP authorization, new DIP budget, and how to deal with the DIP in a plan.	AP	0.70	\$350.00	\$245.00
09/07/2023	Listen in on part of call with counsel for the Unsecured Creditors Committee and Keystone Savings Bank discussing extending the interim DIP authorization, final DIP authorization, new DIP budget, and how to deal with the DIP in a plan. (No Charge).	JP	0.40	\$0.00	\$0.00
09/07/2023	Meeting with Attorney Austin Peiffer and Leah Watson discussing how to prepare liquidation analysis. (No Charge).	JP	0.40	\$0.00	\$0.00

09/07/2023	Meeting with Attorney Joe Peiffer and Leah Watson discussing how to prepare liquidation analysis.	AP	0.40	\$350.00	\$140.00
09/07/2023	Meeting with Attorneys Joe & Austin Peiffer discussing how to prepare liquidation analysis. (No Charge).	LW	0.40	\$0.00	\$0.00
09/07/2023	Review, revise, and circulate consent order granting Manchester Leasing's stay relief motion.	AP	0.20	\$350.00	\$70.00
09/07/2023	Finish categorizing Manchester Leasing secured claims.	AP	0.20	\$350.00	\$70.00
09/07/2023	Call with Unsecured Creditors Committee's counsel discussing impending Keystone Savings Bank objection to Ag & Business Legal Strategies' fee application.	AP	0.20	\$350.00	\$70.00
09/07/2023	Email to Keystone Savings Bank's attorney inquiring why he is considering filing an objection to Ag & Business Legal Strategies' fee application. (No Charge).	AP	0.30	\$0.00	\$0.00
09/07/2023	Review and reply to Keystone Savings Bank's counsel's email about objecting to Ag & Business Legal Strategies' fee application.	AP	0.10	\$350.00	\$35.00
09/07/2023	Customize blank liquidation analysis form for this case's complexities.	AP	0.30	\$350.00	\$105.00
09/07/2023	Drafting Complaint for Injunction to protect Dennis Bruce from claims of creditors.	JP	1.80	\$575.00	\$1,035.00
09/07/2023	Review spreadsheet of schedule updates and make changes in BestCase. (No Charge).	LW	0.50	\$0.00	\$0.00
09/07/2023	Download Schedules A/B, D, E/F, G, H, & SOFA from BestCase, download, spreadsheet of schedule amendments from NetDocuments, and email to Dennis Bruce & Todd Shores for review. (No Charge).	LW	0.20	\$0.00	\$0.00
09/07/2023	Meeting with Austin Peiffer to discuss how to address Keystone Savings Bank's objection to Fee Application by ABLs. (No Charge).	JP	0.60	\$0.00	\$0.00
09/07/2023	Email Todd Shores to request they review the amended schedules and provide any feedback by Tuesday 9/12. (No Charge).	LW	0.10	\$0.00	\$0.00
09/07/2023	Meeting with Joseph Peiffer to discuss how to address Keystone Savings Bank's objection to Fee Application by ABLs.	AP	0.60	\$350.00	\$210.00
09/07/2023	Export Schedule A/B from BestCase and begin working on Liquidation Analysis.	LW	0.30	\$170.00	\$51.00
09/07/2023	Draft fourth consent order extending interim DIP order and corresponding proposed budget and circulate to counsel for Keystone Savings Bank and the Unsecured Creditors Committee.	AP	0.50	\$350.00	\$175.00
09/08/2023	Motion for Preliminary Injunction.	JP	0.30	\$575.00	\$172.50

09/08/2023	Draft Memorandum in Support of Preliminary Injunction.	JP	0.70	\$575.00	\$402.50
09/08/2023	Order Granting TRO.	JP	0.40	\$575.00	\$230.00
09/08/2023	Draft emergency Motion for Temporary Restraining Order.	JP	0.40	\$575.00	\$230.00
09/08/2023	Draft consent order granting ABLS's first fee app, call clerk to verify that is the last remaining item on the docket for today's hearing and that hearing can be cancelled, and send to Attorney Austin Peiffer for review.	MP	0.20	\$170.00	\$34.00
09/08/2023	Review & edit consent order granting Ag & Business Legal Strategies' first fee application and send to Keystone Savings Bank's counsel for his approval.	AP	0.20	\$350.00	\$70.00
09/08/2023	Compare values of property listed on schedules to values of property on creditors filed Proofs of Claim and update schedules in BestCase if creditor listed a lower property value. (No Charge).	LW	0.90	\$0.00	\$0.00
09/08/2023	Review accounts receivable and production packet information, compare with budgeted revenues, and draft email to client's principals inquiring about discrepancies.	AP	0.70	\$350.00	\$245.00
09/08/2023	Finalize and submit proposed order granting ABLS's first fee app. Place telephone call to Courtroom Deputy to inform her that it was coming. (No Charge).	MP	0.10	\$0.00	\$0.00
09/08/2023	Confirm that all matters set for hearing today are resolved and respond to Unsecured Creditors Committee's counsel's email discussing today's hearings.	AP	0.10	\$350.00	\$35.00
09/08/2023	Review documents from client and draft email to counsel for Keystone Savings Bank and the Unsecured Creditors Committee discussing client's postpetition accounts receivable, prepetition accounts receivable, postpetition accounts payable, and current week collections and accounts receivable, showing that client has over \$1 million in outstanding postpetition accounts receivables and near-accounts receivable.	AP	1.80	\$350.00	\$630.00
09/08/2023	Credit for July 20 email not no-charged in first ABLS Fee Application.	JP	0.10	-\$575.00	-\$57.50
09/08/2023	Receive call from Todd Shores with questions regarding schedule amendments. (No Charge).	LW	0.10	\$0.00	\$0.00
09/08/2023	Add all of Schedule A/B and each item's value to the Liquidation Analysis.	LW	1.20	\$170.00	\$204.00
09/08/2023	Call with RP Construction's attorney discussing Ag & Business Legal Strategies' first fee application, Keystone Savings Bank's objection, and plan status.	AP	0.20	\$350.00	\$70.00
09/08/2023	Email drafted Order Granting First and Final Application for Compensation for Appraiser to Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00

09/08/2023	Email current draft of Liquidation Analysis to Attorney Austin Peiffer for his review and edits. (No Charge).	LW	0.10	\$0.00	\$0.00
09/08/2023	Research civil and bankruptcy rules on judgments and orders.	AP	0.20	\$350.00	\$70.00
09/08/2023	Draft proposed order granting motion to pay prepetition wages.	AP	0.20	\$350.00	\$70.00
09/08/2023	Submit proposed order granting motion to pay prepetition wages with explanation for why it's necessary.	AP	0.10	\$350.00	\$35.00
09/08/2023	Respond to Keystone Savings Bank inquiry about appropriate scope of stay relief motion.	AP	0.10	\$350.00	\$35.00
09/08/2023	Review revised three-week budget for new interim DIP authorization and respond to client's principals with suggested modification.	AP	0.20	\$350.00	\$70.00
09/08/2023	Call with Unsecured Creditors Committee's counsel discussing prepetition retainer issue, interim DIP reauthorization, and possible plan provisions.	AP	0.50	\$350.00	\$175.00
09/09/2023	Research Judge Collins cases that enjoined collection activities against guarantors of corporate obligations/	JP	0.20	\$575.00	\$115.00
09/10/2023	Review In re Bailey Ridge Partners, LLC a case where Judge Collins granted an injunction to stay litigation against guarantors.	JP	0.50	\$575.00	\$287.50
09/10/2023	Revise Memorandum in Support of Motion for Preliminary Injunction to incorporate research from cases ruled on by Judge Collins extending the stay to protect guarantors.	JP	0.80	\$575.00	\$460.00
09/10/2023	Draft declaration of Dennis Bruce in support of Injunction.	JP	0.40	\$575.00	\$230.00
09/10/2023	Draft Proposed Order granting Temporary Restraining Order.	JP	0.40	\$575.00	\$230.00
09/11/2023	Draft e-mail to clients regarding temporary restraining order to protect BDC Group President Dennis Bruce.	JP	0.30	\$575.00	\$172.50
09/11/2023	Edit and Format the Proposed Order, Emergency Motion for TRO, Bruce Declaration Ex. A, Memorandum in Support of Motion for Prelim Inj., and Adversary Proceeding Seeking Injunctive Relief.	AT	2.90	\$170.00	\$493.00
09/11/2023	Draft avoidance action report.	AP	3.10	\$350.00	\$1,085.00
09/11/2023	Review Motion for TRO and related documents. Fix formatting issues as needed. (No Charge).	MP	0.40	\$0.00	\$0.00
09/11/2023	Proofread and correct errors in TRO Adversary.	MP	0.20	\$170.00	\$34.00
09/11/2023	Draft comparison of unsecured creditors committee's document requests with client's responses and analyze with Attorney Joseph Peiffer.	AP	0.60	\$350.00	\$210.00

09/11/2023	Analyze Debtor's responses to Committee's Request for Production of documents and make comments with Attorney Austin Peiffer.	AP	0.20	\$350.00	\$70.00
09/11/2023	Compose, send and receive e-mails with Dennis Bruce regarding lawsuits filed against him personally.	JP	0.10	\$575.00	\$57.50
09/11/2023	Add secured claim amounts and class numbers to the drafted liquidation analysis.	LW	1.30	\$170.00	\$221.00
09/11/2023	Email updated liquidation analysis to Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
09/11/2023	Email Dennis and Todd a copy of the Order approving payment to Craig Hillpipe. (No Charge)	AT	0.20	\$0.00	\$0.00
09/12/2023	Research controlling and persuasive caselaw on whether repaying a debt using a credit card is a preference.	AP	0.50	\$350.00	\$175.00
09/12/2023	Review client's CFO's notes and comments on list of potential avoidance actions and respond with explanation of why certain payments did not satisfy the definition of a preference.	AP	0.40	\$350.00	\$140.00
09/12/2023	Final review of, edits to, and proofreading of list of possible avoidance actions, including incorporating new information client's CFO provided.	AP	0.60	\$350.00	\$210.00
09/12/2023	Finalize the Report on Potential Avoidance Actions along with the two Exhibits.	AT	0.80	\$170.00	\$136.00
09/12/2023	Draft analysis of potential defenses to avoidance actions and incorporate into report on potential avoidance actions.	AP	1.40	\$350.00	\$490.00
09/12/2023	Upload spreadsheet of potential SOFA amendments to NetDocuments and email link to Attorney Austin Peiffer and Of Counsel Yara Halloush. (No Charge).	LW	0.10	\$0.00	\$0.00
09/12/2023	Compare updated Assets and Leasing Tracker provided by BDC Group Inc. with the current schedules and update values on schedule amendment spreadsheet and in BestCase as needed. (No Charge).	LW	2.70	\$0.00	\$0.00
09/12/2023	Place telephone call to Kevin Asehan @ True North regarding insurance check for trailer. Leave VM asking for call back.	MP	0.10	\$170.00	\$17.00
09/12/2023	Call with Unsecured Creditors Committee's counsel discussing ARs, APs, DIP budget, status of prepetition retainer objection, scheduling document production for Rule 2004 examination, and fee application procedure.	AP	0.70	\$350.00	\$245.00
09/12/2023	Email to client's CFO discussing Unsecured Creditors Committee's request for more information on APs and ARs.	AP	0.30	\$350.00	\$105.00
09/12/2023	Add final edits to MTLs for Caterpillar equipment and re-circulate for final reviews.	MP	0.20	\$170.00	\$34.00

09/12/2023	Draft email to Mark Ludolph per Attorney Austin Peiffer's request confirming that 30 days to file Caterpillar's Report of Sale is fine with us. (No Charge).	MP	0.10	\$0.00	\$0.00
09/13/2023	Research & draft motion to terminate or waive exclusivity.	AP	1.50	\$350.00	\$525.00
09/13/2023	Finish updating BestCase with schedule amendments from the updated Assets & Leasing Tracker provided by Todd Shores. (No Charge).	LW	1.50	\$0.00	\$0.00
09/13/2023	Compare Deere's POCs with current values we have listed on our schedules. (No Charge).	LW	0.50	\$0.00	\$0.00
09/13/2023	Research injunctions extending the automatic stay to protect related parties and review & edit complaint, motion for injunction, memorandum supporting motion for injunction, affidavit supporting motion for injunction, and proposed temporary restraining order.	AP	2.10	\$350.00	\$735.00
09/13/2023	Review and revise Complaint, Declaration, Order and Motion for TRO.	JP	2.00	\$575.00	\$1,150.00
09/13/2023	Print drafts of amended Schedules A/B, D, E/F, G, H, & SOFA and save to NetDocuments. (No Charge).	LW	0.20	\$0.00	\$0.00
09/13/2023	Email current draft of amended Schedules A/B, D, E/F, G, H, & SOFA, as well as the spreadsheet of changes, to Dennis Bruce & Todd Shores for review. (No Charge).	LW	0.20	\$0.00	\$0.00
09/14/2023	Update drafted liquidation analysis to reflect recent schedule amendments.	LW	0.40	\$170.00	\$68.00
09/14/2023	Status update meeting with Attorney Joe Peiffer client's principals and Keystone Savings Bank representatives.	AP	0.80	\$350.00	\$280.00
09/14/2023	Follow up with attorneys for ECICOG and the Unsecured Creditors Committee discussing status of stay relief for ECICOG.	AP	0.10	\$350.00	\$35.00
09/14/2023	Incorporate new statements into Dennis Bruce's affidavit and perform final review of adversary complaint, emergency motion for temporary restraining order, and supporting documents.	AP	0.70	\$350.00	\$245.00
09/14/2023	Draft Notice of Assumption & Rejection of Leases.	LW	0.60	\$170.00	\$102.00
09/14/2023	Review client's approved budget for interim DIP extension and send to counsel for Keystone Savings Bank and the Unsecured Creditors Committee.	AP	0.20	\$350.00	\$70.00
09/14/2023	Compile and edit line-by-line response to Unsecured Creditors Committee's proposed Rule 2004 examination document requests and send to opposing counsel.	AP	0.30	\$350.00	\$105.00
09/14/2023	Email Dennis Bruce & Todd Shores to inquire whether BDC intends to assume or reject Manchester Leasing's lease #1464 & lease #1465.	LW	0.10	\$170.00	\$17.00

09/14/2023	Participate in meeting with Travis Armstrong, Abram Carls, Austin Peiffer, Dennis Bruce and Todd Shores regarding status of case and moving forward. (Joe Peiffer only attended part of meeting.)	JP	0.50	\$575.00	\$287.50
09/14/2023	Call with Unsecured Creditors Committee's attorney discussing stay relief status, Rule 2004 examination document requests, and interim DIP budget issues.	AP	0.50	\$350.00	\$175.00
09/14/2023	Email drafted Notice of Assumption & Rejection of Leases to Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
09/14/2023	Prepare Exhibits to the Emergency Motion for Temporary Restraining Order Extending the Automatic Stay to Dennis Bruce.	LW	0.30	\$170.00	\$51.00
09/14/2023	Final review and approval of ECICOG stay relief motion & proposed order.	AP	0.10	\$350.00	\$35.00
09/14/2023	Download, bookmark, and upload capital one bank statements to NetDocuments. (No Charge).	LW	0.30	\$0.00	\$0.00
09/14/2023	Email copy of Capital One statements from June 2019 - June 2023 to Dennis Bruce & Todd Shores. (No Charge).	LW	0.10	\$0.00	\$0.00
09/14/2023	Draft the Adversary Complain Seeking Injunctive Relief with Cover Sheet, as well as Motion for Temporary Restraining Order.	AT	2.90	\$170.00	\$493.00
09/14/2023	Finalize and file Caterpillar MTLs and send proposed order to Courtroom Deputy for entry. (No charge).	MP	0.30	\$0.00	\$0.00
09/14/2023	Attempt to find registered agents for defendants in adversary to extend automatic stay and grant injunction.	AP	0.20	\$350.00	\$70.00
09/14/2023	Prepare address labels in order to mail the Adversary Complaint for Injunctive Relief, Emergency Motion for Temporary Restraining Order Extending the Automatic Stay to Dennis Bruce, & Memorandum Supporting Motion for Temporary Restraining Order Extending the Automatic Stay to Dennis Bruce as required by the Certificates of Service. (No Charge).	LW	0.50	\$0.00	\$0.00
09/14/2023	Research status of BMO Harris lease matter and Manchester Leasing mud mixers attached to BMO Harris's semi, and draft emails to client's principals, BMO Harris's counsel, Manchester Leasing's counsel, and BMO Harris representative discussing matter.	AP	0.60	\$350.00	\$210.00
09/14/2023	Research lease rejection and the Hiawatha Properties lease, draft motion to reject the lease, and circulate to Hiawatha Properties' counsel.	AP	0.40	\$350.00	\$140.00
09/15/2023	Draft Motion to Assume and Reject Unexpired MLS Leases.	LW	0.30	\$170.00	\$51.00
09/15/2023	Respond to UPN's attorney discussing prepetition damage claim.	AP	0.10	\$350.00	\$35.00

09/15/2023	Follow-up email to BMO & Manchester Leasing's counsel discussing location of BMO's collateral, Manchester's collateral attached to BMO's collateral, and VIN discrepancy on appraiser's report.	AP	0.20	\$350.00	\$70.00
09/15/2023	Draft Notice of Motion to Assume and Reject Unexpired MLS Leases and Notice of Unopposed Motion to Reject Hiawatha Properties Lease.	LW	0.20	\$170.00	\$34.00
09/15/2023	Email drafted Motion to Assume and Reject Unexpired MLS Leases. Notice of Motion to Assume and Reject Unexpired MLS Leases, and Notice of Unopposed Motion to Reject Hiawatha Properties Lease to Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
09/15/2023	Call with UPN's attorney discussing amending schedules to add claim and obtaining insurance information.	AP	0.20	\$350.00	\$70.00
09/15/2023	Email to client's principals discussing UPN damage claim and possibility of insurance.	AP	0.10	\$350.00	\$35.00
09/15/2023	Review & approve notice of motion to reject Hiawatha Properties lease.	AP	0.10	\$350.00	\$35.00
09/15/2023	Email to Keystone Savings Bank's attorney confirming that unneeded titled motor vehicles without PMSIs should be sold to pay down the DIP.	AP	0.10	\$350.00	\$35.00
09/15/2023	Final review of and edits to motion to terminate or waive exclusivity.	AP	0.30	\$350.00	\$105.00
09/15/2023	Review which creditors have PMSIs on Virginia equipment and respond to Keystone Savings Bank's attorney discussing consensual stay relief.	AP	0.20	\$350.00	\$70.00
09/15/2023	Draft proposed order terminating exclusivity.	AP	0.10	\$350.00	\$35.00
09/15/2023	Review and edit motion to assume and reject Manchester Leasing Service leases and send to client's principals for approval.	AP	0.40	\$350.00	\$140.00
09/15/2023	File the Motion to Terminate or Waive Exclusivity. (No Charge)	AT	0.50	\$0.00	\$0.00
09/15/2023	Email the Court with the Proposed Order Terminating Exclusivity. (No Charge)	AT	0.20	\$0.00	\$0.00
09/15/2023	Add Unite Private Network's claim to Schedule F in Best Case. (No Charge).	LW	0.10	\$0.00	\$0.00
09/15/2023	Draft amendment to Ag & Business Legal Strategies' employment application to address Keystone Savings Bank's concerns and circulate to Keystone Savings Bank's counsel for review.	AP	0.20	\$350.00	\$70.00
09/15/2023	Take call from Unsecured Creditors Committee's attorney discussing conversations with Keystone Savings Bank's counsel and prospects for a final DIP agreement.	AP	0.20	\$350.00	\$70.00

09/15/2023	Call with client's owner discussing missing Deere collateral.	AP	0.10	\$350.00	\$35.00
09/15/2023	Leave message for attorney for Manchester Leasing and GreenState discussing collateral in Virginia.	AP	0.10	\$350.00	\$35.00
09/15/2023	Review, edit, and approve notices of lease assumption/rejection motions.	AP	0.20	\$350.00	\$70.00
09/15/2023	Review and forward e-mail from Wes Huisinga regarding trailer missing and making inquiry about the check for stolen trailer and the adequate protection payment due on 9/15/23.	JP	0.10	\$575.00	\$57.50
09/15/2023	Draft Appearance and Request for Service of Papers for Attorney Austin Peiffer in the Adversary Proceeding against Breakout Capital, LLC, Green Note Capital Partners SPV LLC, KYF Global Partners, Marlin Capital Solutions (nka PEAC Solutions), Kyle Enterprises, LLC, and Sheets Sterling, Inc.	LW	0.10	\$170.00	\$17.00
09/15/2023	Respond to John Deere's counsel's email about a missing trailer in Virginia.	AP	0.20	\$350.00	\$70.00
09/15/2023	Email Attorney Austin Peiffer's drafted Appearance in the Adversary Proceeding to Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
09/15/2023	Email to internal business expert with DIP budget and notes for his analysis.	AP	0.40	\$350.00	\$140.00
09/15/2023	Email the Complaint for Injunctive Relief, Emergency Motion for Temporary Restraining Order with Attachments, and Memorandum Supporting Motion for Temporary Restraining Order to the listed emails in the Certificate of Service for these documents. (No Charge)	AT	0.20	\$170.00	\$34.00
09/15/2023	Download, OCR, rename, and upload documents regarding UPN's claim and regarding KSB's equipment to NetDocuments. (No Charge).	LW	0.20	\$0.00	\$0.00
09/15/2023	Forward DIP line increase request to Keystone Savings Bank's attorney with request for confirmation that the information contained is sufficient.	AP	0.10	\$350.00	\$35.00
09/15/2023	Review client's property in Virginia and which creditors hold security interests in it; revise Keystone Savings Bank joint stay relief motion to add other pieces of its collateral and designate which are DIP collateral only and how those proceeds will be applied; research what creditor, if any, has a security interest in a BigTow trailer; and send revised stay relief motion to Keystone Savings Bank's counsel with discussion of changes made and the unencumbered BigTow trailer.	AP	0.80	\$350.00	\$280.00
09/15/2023	Call with Keystone Savings Bank's attorney discussing possibly using new value to finance professional fees, status of the stay relief motion and amending attorney employment application, and timeline for plan.	AP	0.30	\$350.00	\$105.00

09/16/2023	Draft first draft of the Disclosure Statement.	JP	2.70	\$575.00	\$1,552.50
09/16/2023	Update Liquidation Analysis with POC review. (Paralegal Rate).	JP	2.00	\$200.00	\$400.00
09/17/2023	Revise Disclosure Statement to include reference to Liquidation Analysis; and risk factors associated with Chapter 11 cases.	JP	2.00	\$575.00	\$1,150.00
09/17/2023	Continued work on Liquidation Analysis with emphasis on cross-checking the data with the filed proofs of claim and the Plan of Reorganization. (Paralegal Rate).	JP	3.00	\$200.00	\$600.00
09/18/2023	Meeting with Attorney Joe Peiffer discussing status of plan, disclosure statement, and liquidation analysis.	AP	0.40	\$350.00	\$140.00
09/18/2023	Call with judge's chambers confirming it's acceptable to submit conference call instructions for today's telephonic hearing.	AP	0.10	\$350.00	\$35.00
09/18/2023	Call with Alex Tvedte discussing filing notice of ocnference call instructions and circulating those instructions to parties likely to participate. (No Charge).	AP	0.10	\$0.00	\$0.00
09/18/2023	Draft the Notice for Call-In Instructions for the BDC Adversary Hearing.	AT	0.40	\$170.00	\$68.00
09/18/2023	Meeting with Austin Peiffer to discuss what steps to do next on the plan, liquidation analysis and disclosure statement. (No Charge).	JP	0.40	\$0.00	\$0.00
09/18/2023	Review filings in adversary proceeding in preparation for 11:00 hearing.	AP	0.30	\$350.00	\$105.00
09/18/2023	Review, edit, and approve notice of call-in instructions for 11:00 adversary proceeding hearing.	AP	0.10	\$350.00	\$35.00
09/18/2023	Email the instructions for the 9/18/2023 Hearing to all of the appropriate recipients. (No Charge).	AT	0.20	\$0.00	\$0.00
09/18/2023	Represent client in hearing on motion for temporary restraining order extending the automatic stay to client's principal.	AP	0.50	\$350.00	\$175.00
09/18/2023	Call with Attorney Joe Peiffer discussing participation in hearing on motion for temporary restraining order and prospect of using new value to fund administrative expenses. (No Charge).	AP	0.10	\$0.00	\$0.00
09/18/2023	Email to Attorney Joe Peiffer outlining questions about using new value contribution, continued representation without security for fees, responding to Unsecured Creditors Committee's informal document requests, and the Unsecured Creditors Committee's fee application.	AP	0.30	\$350.00	\$105.00
09/18/2023	Give support staff instructions on drafting 7-day bar date notice for Motion to Terminate or Waive Exclusivity. (No Charge).	AP	0.10	\$0.00	\$0.00

09/18/2023	Review email and spreadsheet from Todd Shores regarding vehicles & equipment they plan to keep and email Attorney Austin Peiffer to advise that the items that were not listed on our Motion to Assume & Reject Leases were purchased and financed through Manchester Leasing rather than leased.	LW	0.10	\$170.00	\$17.00
09/18/2023	Draft Notice of Motion to Terminate or Waive Exclusivity.	LW	0.20	\$170.00	\$34.00
09/18/2023	Email drafted Notice of Motion to Terminate or Waive Exclusivity to Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
09/18/2023	Respond to client's CFO's email discussing the difference between Manchester's true leases and disguised financing statements and how they're treated differently in bankruptcy.	AP	0.10	\$350.00	\$35.00
09/18/2023	Participate in hearing on Emergency Motion for Temporary Restraining Order. (No Charge).	JP	0.30	\$0.00	\$0.00
09/19/2023	Email the Summons to the appropriate recipients in the Adversary case.	AT	0.30	\$170.00	\$51.00
09/19/2023	Draft Certificate of Service for Complaint for Injunctive Relief (Doc. 1), Emergency Motion for Temporary Restraining Order (Doc. 2), Memorandum Supporting Motion for Temporary Restraining Order (Doc. 3), and Summons (Doc. 4).	AT	0.70	\$170.00	\$119.00
09/19/2023	Prepare Notice of Motion to Terminate or Waive Exclusivity to be mailed to the Master Service List. (No Charge).	LW	0.20	\$0.00	\$0.00
09/19/2023	Review schedules to ensure that the Felling 24Ft Trail King AT40 Trailer VIN #5FTCF3727J1002169 is not noted as financed by KSB.	LW	0.10	\$170.00	\$17.00
09/19/2023	Email Attorney Austin Peiffer to advise that our schedules and Manchester Leasing's POC #54 show that the Felling 24Ft Trail King AT40 Trailer VIN #5FTCF3727J1002169 is financed by Manchester Leasing rather than CAT.	LW	0.10	\$170.00	\$17.00
09/20/2023	Emails to Caterpillar's counsel and client's principal discussing recovering Caterpillar's Virginia collateral.	AP	0.10	\$350.00	\$35.00
09/20/2023	Respond to Mark Ludolph's email regarding locations of BDC/Caterpillar equipment in Virginia.	MP	0.10	\$170.00	\$17.00
09/20/2023	Emails to opposing counsel & client's principal discussing liquidating GreenState & Manchester Leasing's Virginia collateral.	AP	0.10	\$350.00	\$35.00
09/20/2023	Respond to Attorney Joe Peiffer's email discussing seven questions on plan preparations and five questions on preparing for preliminary injunction hearing in adversary proceeding.	AP	0.40	\$350.00	\$140.00
09/20/2023	Draft various emails to Dennis Bruce and Terry Gibson regarding locations of a pickup and a reel cart that are Green	MP	0.10	\$170.00	\$17.00

State's collateral.					
09/20/2023	Work on plan and liquidation analysis (1.5). Review and edit liquidation analysis, edit plan to match, review secured creditor proofs of claim to verify they match the plan and liquidation analysis (1.5), delete duplicate items in liquidation analysis and make sure schedules will be amended correspondingly (1.0), review list of tools and assign assistant project of inquiring about values (1.0), work on formula to show the extent of Keystone Savings Bank's secured claim (1.0), and begin working on liquidation analysis's comparison of Chapter 7 to Chapter 11 (1.9).	AP	7.90	\$350.00	\$2,765.00
09/20/2023	Email Abe Carls for an update on any comments he may have regarding BCD's drafted plan. (No Charge).	LW	0.10	\$0.00	\$0.00
09/20/2023	Email current drafts of BDC Group Inc.'s plan and disclosure statement to Abe Carls for review.	LW	0.10	\$170.00	\$17.00
09/20/2023	Write initial draft of letter to Dennis Bruce re Hearing on Preliminary Injunction and prospects for obtaining a longer extension of the stay. Send to Attorney Austin Peiffer and Attorney Joseph Peiffer for review and completion.	MP	0.30	\$170.00	\$51.00
09/20/2023	Telephone call and follow up email to Craig Hilpiper regarding percentage of purchase value for tools list.	MP	0.10	\$170.00	\$17.00
09/20/2023	Email Dennis Bruce and Todd Shores to inquire about how much of the items listed on the Tools List tab of the updated assets & leasing tracker are items that BDC Group Inc. still owns.	LW	0.10	\$170.00	\$17.00
09/20/2023	Update formatting on Disclosure Statement. (No Charge).	MP	1.00	\$0.00	\$0.00
09/20/2023	Update Certificate of Service for Adversary Case no. 23-09042.	AT	0.20	\$170.00	\$34.00
09/20/2023	Compare Updated Assets on Schedules being Amended and Debtor's Leasing Tracker with drafted amended schedules, make changes as needed, and remove duplicates. (No Charge).	LW	3.00	\$0.00	\$0.00
09/20/2023	Email copy of appraiser invoice to Todd Shores for payment. (No Charge).	MP	0.10	\$0.00	\$0.00
09/20/2023	Draft email to Terry Gibson regarding party interested in forklift. (No Charge).	MP	0.10	\$0.00	\$0.00
09/20/2023	Email Dennis Bruce and Todd Shores to inquire about whether 2 CAT trailers are leases or purchases, and whether a 2018 RAM was sold.	LW	0.10	\$170.00	\$17.00
09/20/2023	Call with Craig Hilpiper to get Values for Tools and other equipment.	AT	0.20	\$170.00	\$34.00
09/20/2023	Cross-check Manchester Leasing secured claim proofs of claim against liquidation analysis and detail its plan treatment (0.4); add collateral tables to plan for most of	AP	1.40	\$350.00	\$490.00

	remaining creditors without them (0.6); verify secured class claim amounts and collateral values (0.2); and add Marlin Business Bank's treatment to the plan (0.2).				
09/21/2023	Review filed POCs and messages/emails from Attorney Austin Peiffer and make schedule changes in Best Case as needed. (No Charge).	LW	2.50	\$0.00	\$0.00
09/21/2023	Attempt to track down trailer listed on one of GreenState's proofs of claim.	AP	0.20	\$350.00	\$70.00
09/21/2023	Add cites to Doud and Topp to the plan and discussion of client's position about equity in security interests.	AP	0.20	\$350.00	\$70.00
09/21/2023	Review Farmers & Merchants Savings Bank financing statements, tool list with Craig Hilpiper's values, CAT finance lease agreement, Manchester Leasing Services financing statement, and other documents to make plan treatment correspond to these documents.	AP	2.00	\$350.00	\$700.00
09/21/2023	Download and save all of the August Monthly Report Information from client for Attorney Austin Peiffer. (No Charge)	AT	0.40	\$0.00	\$0.00
09/21/2023	Email Dennis Bruce and Todd Shores to follow up on the 2018 RAM, and to inquire about 2 trailers that are not listed on the asset tracker.	LW	0.20	\$170.00	\$34.00
09/21/2023	Attention to plan & liquidation analysis. (No Charge).	AP	0.70	\$0.00	\$0.00
09/21/2023	Prepare spreadsheet of priority claims.	LW	0.30	\$170.00	\$51.00
09/21/2023	Call with Keystone Savings Bank's attorney discussing settlement with the Unsecured Creditors Committee, interim DIP order, final DIP order, possible plan terms, potential new DIP loan and its relationship to new value, and precisely what unsecured creditors are entitled to in a plan.	AP	0.40	\$350.00	\$140.00
09/21/2023	Respond to CFO's email about Manchester Leasing's payment request.	AP	0.10	\$350.00	\$35.00
09/21/2023	Email spreadsheet of priority claims to Attorney Joseph Peiffer and Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
09/21/2023	Review liquidation analysis and ensure line numbers, descriptions, and values match the most recent draft of schedule amendments.	LW	1.00	\$170.00	\$170.00
09/21/2023	Respond to email from Unsecured Creditors Committee's counsel discussing meeting next week and information request related to prepetition accounts receivable.	AP	0.10	\$350.00	\$35.00
09/21/2023	Email to Keystone Savings Bank's attorney requesting bank statements.	AP	0.10	\$350.00	\$35.00
09/21/2023	Email interim DIP budget and proposed order to counsel for Keystone Savings Bank and the Unsecured Creditors	AP	0.10	\$350.00	\$35.00

Committee for approval.					
09/21/2023	Edit plan to incorporate protection for Debtor's principal & guarantor and to explain why PMSI creditors do not get PMSI priority for cross-collateralization claims.	AP	0.60	\$350.00	\$210.00
09/21/2023	Circulate latest plan & liquidation analysis drafts to Attorney Joe Peiffer and counsel for Keystone Savings Bank and Dennis Bruce.	AP	0.10	\$350.00	\$35.00
09/21/2023	Print amended schedules from Best Case and upload to NetDocuments. (No Charge).	LW	0.20	\$0.00	\$0.00
09/22/2023	Case status update meeting with Attorney Joe Peiffer, client's principals, and Keystone Savings Bank's attorney and representatives discussing plan status, prospects of obtaining an injunction to protect Dennis Bruce from guaranties, setting up meeting to review financial projections, and lifting the stay on certain Keystone Savings Bank collateral.	AP	0.80	\$350.00	\$280.00
09/22/2023	Email to client's CFO with Unsecured Creditors Committee's information request related to the Keystone Savings Bank stay relief motion and explanation.	AP	0.10	\$350.00	\$35.00
09/22/2023	Call with Attorney Joe Peiffer and Ag & Business Legal Strategies Chief Financial Strategist Keith Starr discussing client's cash budget projections versus actuals.	AP	0.20	\$350.00	\$70.00
09/22/2023	Meeting with Travis Anderson, Andy Johnson, Abe Carls, Austin Peiffer, Dennis Bruce and Todd Shores regarding provisions in the Plan of Reorganization; Lien position of Bank in the avoidance actions; discussion of adversary proceeding seeking the stay to protect the President of the Debtor from the distractions he is suffering due to the stress put on him by the creditors of the Debtor whose debt he has guaranteed.	JP	0.80	\$575.00	\$460.00
09/22/2023	Forward email from Dennis Bruce regarding vehicle/equipment updates to Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
09/22/2023	Finalize the Proposed Fourth Order Extending Interim DIP with Budget.	AT	0.40	\$170.00	\$68.00
09/22/2023	Review emails from Attorney Austin Peiffer and from clients and make changes to schedules in Best Case as needed.	LW	0.30	\$170.00	\$51.00
09/22/2023	Redact and prepare attachments to August MOR.	LW	0.90	\$170.00	\$153.00
09/22/2023	Save pre-petition invoices, and spreadsheet relating to client's and Attorney Austin Peiffer's email chain. (No Charge)	AT	1.20	\$0.00	\$0.00
09/22/2023	Email August MOR and its attachments to Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
09/22/2023	Review monthly report draft and return to Leah Watson for	AP	0.20	\$350.00	\$70.00

	edits to supporting documents.				
09/22/2023	Review documents client sent us to support funds sources for prepetition lockbox.	AP	0.10	\$350.00	\$35.00
09/22/2023	Assemble supporting documents responsive to Unsecured Creditors Committee's information request for the stay relief motion and send them out with explanatory email and suggestion for resolving any lingering concerns.	AP	0.40	\$350.00	\$140.00
09/22/2023	Finalize and send August MOR to Dennis Bruce via Dropbox Sign for his review and e-signature. (No Charge).	LW	0.20	\$0.00	\$0.00
09/22/2023	Email Todd Vandenberg regarding client's August Monthly Report.	AT	0.10	\$170.00	\$17.00
09/22/2023	Email August MOR Attachments to Dennis Bruce. (No Charge).	LW	0.10	\$0.00	\$0.00
09/22/2023	Respond to e-mail from Todd Vandenberg regarding monthly reports and getting the Keystone Bank Balance below \$250,000.	JP	0.10	\$575.00	\$57.50
09/22/2023	Respond to Todd Vandenberg's inquiry regarding attorney fees paid by BDC in July being held in trust.	JP	0.10	\$575.00	\$57.50
09/22/2023	Respond to e-mail from Dennis Bruce regarding permanent protection from BDC creditors with guarantees signed by him individually.	JP	0.10	\$575.00	\$57.50
09/23/2023	Follow-up e-mail to Dennis Bruce regarding protection available to him in the BDC bankruptcy after plan confirmation.	JP	0.10	\$575.00	\$57.50
09/25/2023	Telephone call to Dennis Bruce regarding Hector Davila having the equipment reported missing by Deere's dealer last week and having transported it to Suitland, MD without permission; discussion of involving police as he now appears to have the CAT excavator as well.	JP	0.10	\$575.00	\$57.50
09/25/2023	Telephone call to Wes Huisinga regarding involving the police in this again since the equipment was taken without permission by Hector Davila and moved over three hours from the storage yard.	JP	0.10	\$575.00	\$57.50
09/25/2023	Receive and respond to e-mails about missing equipment taken by Hector Davila.	JP	0.10	\$575.00	\$57.50
09/25/2023	Review e-mail from Ron Martin regarding personal protection and draft responsive e-mail to him attaching copies of the disclosure statement, liquidation analysis and creditor trust agreement for his review.	JP	0.20	\$575.00	\$115.00
09/25/2023	Review e-mail from Todd Shores regarding information requested by Unsecured Creditor's Committee Counsel and forward it to Liz Janczak for her review.	JP	0.10	\$575.00	\$57.50
09/25/2023	Update list of estimated postpetition payments to secured	AP	0.30	\$350.00	\$105.00

	creditors with information from revised plan and liquidation analysis.				
09/25/2023	Review list of leases and executory contracts, split out instances where multiple Caterpillar leases were listed as one item, and add column of known or presumed decisions on whether client wants to assume or reject these leases or contracts.	AP	0.70	\$350.00	\$245.00
09/25/2023	Email to Manchester Leasing Service's counsel discussing proposed order granting in part motion to assume and reject leases.	AP	0.10	\$350.00	\$35.00
09/25/2023	Email to Hiawatha Properties' attorney discussing order granting motion to reject its lease.	AP	0.10	\$350.00	\$35.00
09/25/2023	Lengthy email to client's principals discussing final DIP budget, lease assumption and rejection, curing lease defaults, drafting a budget for the plan's feasibility analysis, estimated monthly payments to prepetition lessors and secured creditors under the plan, and potential difficulties in partially assuming leases.	AP	1.20	\$350.00	\$420.00
09/25/2023	Telephone call with Lee Palmer who is trying to recover the leased trucks for BMO Harris Bank. Give as much information as I could regarding location, description etc. and draft follow up email to Dennis requesting further information.	MP	0.10	\$170.00	\$17.00
09/25/2023	Draft Proposed Order Granting Unopposed Motion to Reject Unexpired Lease.	LW	0.10	\$170.00	\$17.00
09/25/2023	Draft Proposed Order Granting Motion to Reject Leases with Manchester Leasing Services, Inc.	LW	0.20	\$170.00	\$34.00
09/25/2023	Email drafted Proposed Orders Granting Motions to Reject Leases to Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
09/25/2023	Email to client's CFO clarifying meaning of entries on spreadsheet calculating monthly plan payments.	AP	0.10	\$350.00	\$35.00
09/26/2023	Email Attorney Austin Peiffer to follow up on how to handle the equipment in GSCU's POC that was never purchased and the equipment in CAT's POC that was stolen in 2019. (No Charge).	LW	0.10	\$0.00	\$0.00
09/26/2023	Review email and documents from Attorney Austin Peiffer regarding BDC's contracts/leases and check to see if any updates are needed in the schedules. (No Charge).	LW	0.70	\$0.00	\$0.00
09/26/2023	Email Attorney Austin Peiffer to follow up on the list of tools with the estimated sale prices provided by Craig Hilpipre. (No Charge).	LW	0.10	\$0.00	\$0.00
09/26/2023	Compare versions of liquidation analysis and advise Attorney Austin Peiffer that a couple of items were removed and should be re-added. (No Charge).	LW	0.30	\$0.00	\$0.00

09/26/2023	Place follow up call to Lee w/ BMO's recovery company passing along condition and location info for 20' box trucks that BMO has financed.	MP	0.10	\$170.00	\$17.00
09/26/2023	Call with client's CFO discussing plan budget and final DIP budget.	AP	0.20	\$350.00	\$70.00
09/26/2023	Meeting with Attorney Joe Peiffer discussing plan and liquidation analysis.	AP	0.50	\$350.00	\$175.00
09/26/2023	Meeting with Attorney Joe Peiffer and Unsecured Creditors Committee's counsel discussing plan status, liquidating trust, funding professional fees, Keystone Savings Bank's stay relief request, liquidation analysis, and Rule 2004 examinations.	AP	0.90	\$350.00	\$315.00
09/26/2023	Email Attorney Austin Peiffer to follow up on the drafted Proposed Orders re Lease Rejections. (No Charge).	LW	0.10	\$0.00	\$0.00
09/26/2023	Meeting with Shelly DeRousse and Elizabeth Janczak for the Unsecured Creditor's Committee and Austin Peiffer to discuss potential plan treatment; payment of professional fees; seed money for the Creditor's Trust; Liquidation Analysis; Values used on the Liquidation Analysis; DIP budget through Confirmation; discussion of a joint Disclosure Statement/Confirmation hearing.	JP	0.90	\$575.00	\$517.50
09/26/2023	Draft e-mail to Janet Reasoner regarding problems with DIP account exceeding FDIC insurance maximum and potential solutions.	JP	0.10	\$575.00	\$57.50
09/26/2023	Respond to Janet Reasoner that Debtor will seek to open account at either Wells Fargo or US Bank to eliminate the problem with the over FDIC limits problem.	JP	0.10	\$575.00	\$57.50
09/26/2023	Draft e-mails to Todd Shores regarding whether the MidAmerican Energy AR was shown in the >90 day old ARs and forward answer to the Unsecured Creditor's Committee counsel.	JP	0.10	\$575.00	\$57.50
09/26/2023	Draft e-mail to client regarding discrepancy found by US Trustee in Monthly Operating Reports and funds shown in examination of bank statements and follow-up with client's response to US Trustee's questions.	JP	0.10	\$575.00	\$57.50
09/26/2023	Call with Comstar's attorney discussing amending schedules to increase claim amount to satisfy insurance requirements.	AP	0.20	\$350.00	\$70.00
09/27/2023	Meeting with Attorney Joe Peiffer, client's principals, and Keystone Savings Bank representatives discussing revisions to Keystone Savings Bank's plan treatment, liquidation analysis, liquidation costs, status of avoidance actions as prepetition inchoate general intangibles under the Simply Essentials decision, paying down the DIP after the plan effective date, a post-effective date line of credit, extending and potentially increasing the DIP, cash flow projections for the rest of the year and 2024, and other topics.	AP	3.00	\$350.00	\$1,050.00

09/27/2023	Meeting with Attorney Austin Peiffer, client's principals, and Keystone Savings Bank representatives discussing revisions to Keystone Savings Bank's plan treatment, liquidation analysis, liquidation costs, status of avoidance actions as prepetition inchoate general intangibles under the Simply Essentials decision, paying down the DIP after the plan effective date, a post-effective date line of credit, extending and potentially increasing the DIP, cash flow projections for the rest of the year and 2024, and other topics.	JP	3.00	\$575.00	\$1,725.00
09/27/2023	Meeting with Attorney Joe Peiffer and client's principals reviewing meeting with Keystone Savings Bank and discussing hearing on adversary proceeding to protect Dennis Bruce from guaranty claims and projected timeline for plan proposal and confirmation.	AP	0.40	\$350.00	\$140.00
09/27/2023	Meeting with Attorney Austin Peiffer and client's principals reviewing meeting with Keystone Savings Bank and discussing hearing on adversary proceeding to protect Dennis Bruce from guaranty claims and projected timeline for plan proposal and confirmation.	JP	0.40	\$575.00	\$230.00
09/27/2023	Meeting with Attorney Austin Peiffer reviewing client's newest cash flow projections in preparation for meeting with client's principals and Keystone Savings Bank representatives.	JP	0.30	\$575.00	\$172.50
09/27/2023	Meeting with Attorney Joseph Peiffer reviewing client's newest cash flow projections in preparation for meeting with client's principals and Keystone Savings Bank representatives.	AP	0.30	\$350.00	\$105.00
09/27/2023	Review Schedule F to double-check that all BDC's old AR debtors are listed on Schedule F with potential counterclaims against BDC. (No Charge).	LW	0.30	\$0.00	\$0.00
09/27/2023	Search for document in all of Austin's emails upon his request. (No Charge)	AT	1.80	\$0.00	\$0.00
09/27/2023	Remove duplicated trailer from Sch A/B in Best Case. (No Charge).	LW	0.10	\$0.00	\$0.00
09/27/2023	Update drafted Proposed Order Granting Motion to Reject Lease to indicate that BDC Group Inc. is authorized to reject any lease it might have with Hiawatha Properties, LLC.	LW	0.10	\$170.00	\$17.00
09/27/2023	Review, edit, and approve Proposed Orders Granting Motions to Reject Leases.	AP	0.10	\$350.00	\$35.00
09/27/2023	Email drafted Proposed Order Granting Motion to Reject Leases to Terry Gibson for review. (No Charge).	LW	0.10	\$0.00	\$0.00
09/27/2023	Emails and texts with Lee Palmer and Dennis Bruce re recovery of BMO box trucks and padlock code.	MP	0.10	\$170.00	\$17.00
09/28/2023	Follow-up call with Lee Palmer for Attorney Austin Peiffer.	AT	0.10	\$0.00	\$0.00

	Said that he got the information that he needed from Mike. (No Charge)				
09/28/2023	Finalize the Certificate of Service for the Adversary Case. (No Charge).	AT	0.40	\$0.00	\$0.00
09/28/2023	Update the four different Certificates of Service required for the Adversary Case. (No Charge).	AT	1.00	\$0.00	\$0.00
09/28/2023	Update drafted Proposed Order Granting Motion to Reject Unexpired Leases to include that the stay is lifted in regard to the equipment leases being rejected, and MLS is authorized to proceed with recovery.	LW	0.10	\$170.00	\$17.00
09/28/2023	Email updated Proposed Order Granting Motion to Reject Unexpired Leases to Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
09/28/2023	Email updated Proposed Order Granting Motion to Reject Unexpired Leases to Terry Gibson for review. (No Charge).	LW	0.10	\$0.00	\$0.00
09/28/2023	Tweak formatting on 4 certificates of service for adversary documents. (No Charge).	MP	0.10	\$0.00	\$0.00
09/28/2023	File multiple certificates of service in the adversary case. (No Charge)	AT	1.10	\$0.00	\$0.00
09/28/2023	Respond to client's inquiry about payments to Manchester Leasing to cure lease defaults.	AP	0.20	\$350.00	\$70.00
09/28/2023	Respond to Manchester Leasing's attorney's comments on proposed order rejecting leases.	AP	0.10	\$350.00	\$35.00
09/28/2023	Respond to client's CFO's questions about new Manchester Leasing lease termination dates given the consensual two- month extension and timing on catching up on payments.	AP	0.10	\$350.00	\$35.00
09/28/2023	Email to Manchester Leasing's attorney discussing timing for payments of cure amounts for lease monthly payments and new lease termination dates.	AP	0.20	\$350.00	\$70.00
09/28/2023	Review, edit, and approve edited proposed order rejecting Manchester Leasing leases.	AP	0.10	\$350.00	\$35.00
09/28/2023	Review Manchester Leasing's limited objection to client's motion to assume its leases and respond to its attorney's inquiry about curing late fee and attorney fee defaults.	AP	0.20	\$350.00	\$70.00
09/29/2023	Update the Certificate of Service and Change of Address for the Creditor Matrix.	AT	0.60	\$170.00	\$102.00
09/29/2023	Add entries for all BDC Group Inc.'s prepetition ARs as potential counterclaims against debtor in Schedule F. (No Charge).	LW	0.70	\$0.00	\$0.00
10/01/2023	Edit motion to continue hearing on temporary restraining order.	AP	0.20	\$350.00	\$70.00

10/01/2023	Draft proposed order granting motion to continue hearing on temporary restraining order.	AP	0.20	\$350.00	\$70.00
10/01/2023	File motion to continue hearing on temporary restraining order and submit proposed order granting motion to continue hearing on temporary restraining order. (No Charge).	AP	0.30	\$0.00	\$0.00
10/02/2023	Two early-morning telephone calls to Courtroom Deputy Danielle Cripe regarding continuing hearing scheduled for today. (No Charge).	MP	0.10	\$0.00	\$0.00
10/02/2023	Email to Breakout Capital's new attorney for the adversary.	AP	0.10	\$350.00	\$35.00
10/02/2023	Review tools list and draft email to Leah Watson discussing how to handle it in the schedules and liquidation analysis.	AP	0.10	\$350.00	\$35.00
10/02/2023	Respond to email from Leah Watson discussing how to handle vehicles client's principal says are not client's property.	AP	0.10	\$350.00	\$35.00
10/02/2023	Review and approve consensual stay relief order for GreenState Credit Union.	AP	0.10	\$350.00	\$35.00
10/02/2023	Email to client's principals discussing curing monetary defaults on Manchester Leasing's true leases.	AP	0.20	\$350.00	\$70.00
10/02/2023	Review F&M Bank Rule 2004 motion and order and email Unsecured Creditors Committee's attorney discussing correcting apparent scrivener's error.	AP	0.10	\$350.00	\$35.00
10/02/2023	Call with Keystone Savings Bank's attorney discussing plan revisions, plan treatment, collateral valuation, and addressing secured and unsecured claims.	AP	0.40	\$350.00	\$140.00
10/03/2023	Continue to Update the Certificate of Service from the Creditors Matrix and the returned mail.	AT	1.20	\$170.00	\$204.00
10/03/2023	Meeting with Alex Tvedte discussing appearances in and objections to the stay extension adversary proceeding.	AP	0.10	\$350.00	\$35.00
10/03/2023	Email drafts of the Plan, Disclosure Statement, Liquidation Analysis, and Creditors Trust to Dennis Bruce and Todd Shores. (No Charge).	LW	0.10	\$0.00	\$0.00
10/03/2023	Remove items from Schedule B in Best Case that were stolen, never purchased, or personal purchases rather than business. (No Charge).	LW	0.20	\$0.00	\$0.00
10/03/2023	Download and save September Monthly Reporting Information in ND for Attorney Austin Peiffer. (No Charge)	AT	0.30	\$0.00	\$0.00
10/03/2023	Reformat & organize appraised tools list, compare to current draft of Schedule B, update descriptions and values of items on Schedule B in Best Case as needed, and track all changes in Schedule Amendments spreadsheet. (No Charge).	LW	1.20	\$0.00	\$0.00

10/03/2023	Send current plan documents to client's principals.	AP	0.10	\$350.00	\$35.00
10/03/2023	Call with Keystone Savings Bank's attorney discussing paying attorney fees, postpetition budget and line of credit, applying new value, and how claim liquidation will proceed.	AP	0.30	\$350.00	\$105.00
10/03/2023	Review client's latest cash flow projections, identify and correct formula error, identify discrepancy between most recent actual DIP balance in the cash flow and the current DIP balance, identify shortfall between actual and projected collections and trend over the last several weeks, and draft email to client's principals outlining these issues and discussing their consequences.	AP	1.50	\$350.00	\$525.00
10/03/2023	Email corrected cash flow projection to Keystone Savings Bank's attorney with explanation.	AP	0.10	\$350.00	\$35.00
10/03/2023	Call with Keystone Savings Bank's attorney discussing status on his plan revisions, plan treatment for bank and secured creditors, collateral status of avoidance actions, revisions to cash flow, and addressing prepetition accounts receivable bank account balance.	AP	0.40	\$350.00	\$140.00
10/03/2023	Respond to email from client's CFO discussing reasons for being concerned about the cash flow projections.	AP	0.20	\$350.00	\$70.00
10/04/2023	Format and organize tool list with Craig Hilpiper's appraised values to be used as an exhibit to Schedule A/B. (No Charge).	LW	0.20	\$0.00	\$0.00
10/04/2023	Email updated tool list to Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
10/04/2023	Review Unsecured Creditors Committee's redline of the liquidating trust agreement and Keystone Savings Bank's redline of the plan and make edits to the plan and responses to comments on it.	AP	0.90	\$350.00	\$315.00
10/04/2023	Call with Attorney Joe Peiffer and Unsecured Creditors Committee's counsel discussing final DIP budget, Friday's stay relief hearing, liquidation analysis, and proposed Rule 2004 examination rider.	AP	0.50	\$350.00	\$175.00
10/04/2023	Review Unsecured Creditors Committee's redline of the liquidating trust agreement and Keystone Savings Bank's redline of the plan and make edits to the plan and responses to comments on it.	JP	0.90	\$575.00	\$517.50
10/04/2023	Telephone call to Janet Reasoner regarding questions about CDARS for excess funds and potential questions regarding disbursements. (No Charge).	JP	0.20	\$0.00	\$0.00
10/04/2023	Telephone call to Todd Vandenberg regarding questions regarding disbursements on monthly operating reports. (No Charge).	JP	0.20	\$0.00	\$0.00
10/04/2023	Draft e-mails to Janet Reasoner regarding use of CDARS. (No Charge).	JP	0.20	\$0.00	\$0.00

10/05/2023	Meeting with Dennis Bruce, Todd Shores, Travis Armstrong and Andy Johnson of Keystone Savings Bank, Abram Carls and Austin Peiffer to discuss status of bankruptcy plan preparation; combined disclosure statement/Confirmation hearing; DIP budget; and Plan Budget.	JP	0.60	\$575.00	\$345.00
10/05/2023	Plan & case status update meeting with Attorney Joe Peiffer, client's principals, and Keystone Savings Bank's representatives.	AP	0.60	\$350.00	\$210.00
10/05/2023	Review plan to delete unused definitions and meld various changes between different versions.	AP	0.80	\$350.00	\$280.00
10/05/2023	Review proposed revisions to Keystone Savings Bank and the United States Small Business Administration's plan treatment, provide comments and suggested edits, and incorporate revisions into liquidation analysis.	AP	1.10	\$350.00	\$385.00
10/05/2023	Communications: Call with Attorney Austin Peiffer and Unsecured Creditors Committee's counsel discussing final DIP budget.	JP	0.50	\$575.00	\$287.50
10/05/2023	Calculate Keystone Savings Bank plan payments under revised plan treatment.	AP	1.00	\$350.00	\$350.00
10/06/2023	Finish modeling Keystone Savings Bank plan payments based on its proposed plan treatment.	AP	0.40	\$350.00	\$140.00
10/06/2023	Email to client's principals discussing amending Comstar's scheduled claim.	AP	0.30	\$350.00	\$105.00
10/06/2023	Review SBA's proof of claim and model its proposed plan treatment.	AP	0.60	\$350.00	\$210.00
10/06/2023	Represent client in hearing on motion to lift stay on some of Keystone Savings Bank's collateral.	AP	0.70	\$350.00	\$245.00
10/06/2023	Download, OCR, and upload September MOR documents to NetDocuments. (No Charge).	LW	0.20	\$0.00	\$0.00
10/06/2023	Observe hearing on motion to lift stay on some of Keystone Savings Bank's collateral. (No Charge).	JP	0.70	\$0.00	\$0.00
10/06/2023	Scan, OCR, and upload Attorney Joseph Peiffer's notes from today's Hearing on KSB's Motion for Relief from Stay to NetDocuments. (No Charge).	LW	0.10	\$0.00	\$0.00
10/06/2023	Add new information from proposed plan to plan calculation spreadsheet.	AP	0.30	\$350.00	\$105.00
10/06/2023	Modify liquidation costs for tangible assets.	AP	0.60	\$350.00	\$210.00
10/06/2023	Add line to Schedule B in Best Case for the various appraised tools list. (No Charge).	LW	0.10	\$0.00	\$0.00
10/06/2023	Update Comstar Supply's claim amount on Schedule F in Best Case. (No Charge).	LW	0.10	\$0.00	\$0.00

10/06/2023	Draft email to Attorney Joe Peiffer and Keystone Savings Bank's counsel discussing valuation questions and question about how to handle postpetition revenues.	AP	1.30	\$350.00	\$455.00
10/06/2023	Meeting with Attorney Joe Peiffer reviewing liquidation analysis discussing liquidation costs, plan treatment, and treatment of postpetition profits.	AP	1.20	\$350.00	\$420.00
10/07/2023	Revise Plan or Reorganization to include reference to Plan Sponsor and evaluated suggested substantial changes in treatment of the claim of Keystone Savings Bank.	JP	1.80	\$575.00	\$1,035.00
10/08/2023	Review changes made to DIP Credit Agreement through KSB's changes in the Plan.	JP	0.50	\$575.00	\$287.50
10/09/2023	Compare current draft of Amended Schedules to the Liquidation Analysis and update values and line numbers on the Liquidation Analysis to match the Amended Schedules.	LW	0.60	\$170.00	\$102.00
10/09/2023	Email current draft of the Amended Schedules to Attorney Austin Peiffer for review, and advise that the Liquidation Analysis has been updated to match the current draft of the Amended Schedules. (No Charge).	LW	0.10	\$0.00	\$0.00
10/09/2023	Review liquidation analysis to ensure the plan satisfies the best interests of creditors test.	AP	1.00	\$350.00	\$350.00
10/09/2023	Email Amended Schedules, its Exhibits, and spreadsheet of schedule changes to Dennis Bruce and Todd Shores for review. (No Charge).	LW	0.20	\$0.00	\$0.00
10/09/2023	Meeting with client's principals and Attorney Joe Peiffer discussing plan status, liquidation analysis, postpetition line of credit, postpetition debts, and other issues.	AP	0.80	\$350.00	\$280.00
10/09/2023	Finalize Exhibit B-50 and SOFA Q3 to Amended Schedules. (No Charge).	LW	0.20	\$0.00	\$0.00
10/09/2023	Email Todd Shores to request a copy of BerganKDV/Create Planning, LLC's correct invoice when received so we can file an Application for Compensation on its behalf.	LW	0.10	\$170.00	\$17.00
10/09/2023	Meeting with client's principals and Attorney Austin Peiffer discussing plan status, liquidation analysis, postpetition line of credit, postpetition debts, and other issues.	JP	0.80	\$575.00	\$460.00
10/09/2023	Review liquidation analysis and incorporate changes that have been made to Schedule B.	AP	0.30	\$350.00	\$105.00
10/09/2023	Research security interests in inchoate interests in property.	AP	1.00	\$350.00	\$350.00
10/09/2023	Review liquidation analysis and secured creditor collateral values, and research distinction between liquidation costs which cannot render a secured creditor undersecured and differences in collateral value which can.	AP	0.50	\$350.00	\$175.00
10/09/2023	Draft e-mail response to Abram Carls explaining request for information regarding whether the revised DIP Credit	JP	0.10	\$575.00	\$57.50

Agreement was accurate.					
10/09/2023	Draft e-mail to Abram Carls regarding KSB becoming an approved depository for the US Trustee Program.	JP	0.10	\$575.00	\$57.50
10/10/2023	Research caselaw on when a debtor has sufficient rights in collateral to grant a security interest in it.	AP	1.50	\$350.00	\$525.00
10/10/2023	Reply to client's email discussing paying accountant's fees.	AP	0.20	\$350.00	\$70.00
10/10/2023	Research and consider distinction between collateral valuation and liquidation costs.	AP	0.40	\$350.00	\$140.00
10/10/2023	Call with Keystone Savings Bank's attorney discussing plan language, liquidation analysis, payment waterfalls, liquidating trust, and confirmation requirements.	AP	0.90	\$350.00	\$315.00
10/10/2023	Call with Attorney Joe Peiffer discussing plan, liquidation analysis, Keystone Savings Bank's plan treatment, and paying tax claims.	AP	0.30	\$350.00	\$105.00
10/10/2023	Revise plan and liquidation analysis after conversations with Attorney Joe Peiffer and Keystone Savings Bank's attorney.	AP	0.80	\$350.00	\$280.00
10/10/2023	Email to Attorney Joe Peiffer and Keystone Savings Bank's attorney attaching latest versions of complete plan documents, describing each one and how it fits together with the other documents, and changes that still need to be made to each document.	AP	1.00	\$350.00	\$350.00
10/10/2023	Email to Attorney Joe Peiffer outlining possible issues with plan confirmation and changes that might need to be made to the plan to avoid objections.	AP	1.00	\$350.00	\$350.00
10/10/2023	Continue updating Disclosure Statement to correspond with revised Chapter 11 Plan.	JP	0.90	\$575.00	\$517.50
10/10/2023	Telephone call from Austin Peiffer relaying things he had discussed with Abram Carls regarding the Plan of Reorganization. (No Charge).	JP	0.30	\$0.00	\$0.00
10/11/2023	Draft the E-Signature Cover Page for BDC Group Inc.'s Amended Schedules. (No Charge).	LW	0.10	\$0.00	\$0.00
10/11/2023	Draft e-mails to client to confirm which CAT leases were being assumed.	JP	0.10	\$575.00	\$57.50
10/11/2023	Revise Plan of Reorganization to eliminate unused provisions of the plan; alter the releases, clarify the treatment of the SBA partially secured claim, and provide a notice of right to cure default for the Reorganized Debtor if it misses a payment.	JP	2.70	\$575.00	\$1,552.50
10/11/2023	Email Dennis Bruce to follow up on the Amended Schedules. (No Charge).	LW	0.10	\$0.00	\$0.00
10/11/2023	Prepare the Amended Schedules for Dennis Bruce's e-signature. (No Charge).	LW	0.10	\$0.00	\$0.00

10/11/2023	Telephone call to Abram Carls regarding the provisions of the Chapter 11 Plan that were amended and how to treat the SBA	JP	0.60	\$575.00	\$345.00
10/11/2023	Revise Disclosure Statement to update classification of claims; risk factors, evaluate feasibility and current performance of the Debtor.	JP	2.40	\$575.00	\$1,380.00
10/11/2023	Review e-mail from Todd Shores regarding payment of cure payment due to Manchester leasing and draft confirming e-mail to Terry Gibson, Manchester Leasing's Attorney confirming that ACH will be in Manchester Leasing's hands on October 12, 2023.	JP	0.10	\$575.00	\$57.50
10/12/2023	Send Amended Schedules and E-Signature Cover Page to Dennis Bruce via Dropbox Sign for his e-signature. (No Charge).	LW	0.10	\$0.00	\$0.00
10/12/2023	Email Dennis Bruce to advise I am sending the Amended Schedules and E-Signature Cover Page via Dropbox Sign for his e-signature. (No Charge).	LW	0.10	\$0.00	\$0.00
10/12/2023	Meeting with Travis Armstrong, Andy Johnson, Abram Carls, Dennis Bruce and Todd Shores to discuss the status of the Plan and Disclosure Statement, Motion for Combined Disclosure Statement and Confirmation Hearing, Amendment of Schedules; and, DIP Financing extension.	JP	0.70	\$575.00	\$402.50
10/12/2023	Draft Motion to Set Bar Date for Non-Governmental Units to File a Proof of Claim.	LW	0.50	\$170.00	\$85.00
10/12/2023	File the Amended Schedules of A/B, D, E/F, G, H, Summary of Assets and Liabilities, and SOFA with attachments. (No Charge)	AT	0.70	\$0.00	\$0.00
10/12/2023	Download signed Amended Schedules & E-Signature Cover Page and save to NetDocuments. (No Charge).	LW	0.10	\$0.00	\$0.00
10/12/2023	Prepare Amended Schedules and its attachments for filing. (No Charge).	LW	0.10	\$0.00	\$0.00
10/12/2023	Draft First Application for Compensation for Debtor's Accountant.	LW	0.50	\$170.00	\$85.00
10/12/2023	Draft Notice of Amended Schedules. (No Charge).	LW	0.20	\$0.00	\$0.00
10/12/2023	Call BerganKDV to request job titles and hourly rates of individuals listed on their invoice, but no answer. (No Charge).	LW	0.10	\$0.00	\$0.00
10/12/2023	Email BDC Group Inc.'s accountant, Joe Benter, to request the job titles and hourly rates of the individuals with time entries on their invoice.	LW	0.10	\$170.00	\$17.00
10/12/2023	Search BerganKDV's website for the job titles of the individuals with time entries on its invoice. (No Charge).	LW	0.10	\$0.00	\$0.00
10/12/2023	Research items that must be included in the Disclosure	JP	0.50	\$575.00	\$287.50

	Statement and draft e-mail to Dennis Bruce regarding required disclosures.				
10/12/2023	Cross-reference information on leases from our Motion to Assume Leases and the proposed consent order for Assumption of Leases.	AT	0.50	\$170.00	\$85.00
10/12/2023	Cross-reference information to get the check and see if the math for the payments adds up correctly or not.	AT	0.70	\$170.00	\$119.00
10/12/2023	Review motion to combine hearings and make edits and corrections.	MP	0.10	\$170.00	\$17.00
10/12/2023	Begin drafting 2nd Application for Compensation for ABLs.	MP	0.30	\$170.00	\$51.00
10/12/2023	Email the client to get confirmation on the amount that they paid for the cure of default for the leases they want to assume. (No Charge)	AT	0.20	\$0.00	\$0.00
10/12/2023	Update the draft of the 1st Accountant Fee App for BerganKDV.	AT	0.40	\$170.00	\$68.00
10/12/2023	Edit plan ballots based on requests from Attorney Joseph Peiffer.	MP	0.30	\$170.00	\$51.00
10/12/2023	Draft email to A-UST Janet Reasoner with copies of the proposed ballots for her review and request any questions she may have on them. (no Charge).	MP	0.10	\$0.00	\$0.00
10/12/2023	Draft Debtor's Motion for Conditional Approval of Disclosure Statement and to Combine Hearings on Final Approval of Disclosure Statement and Confirmation of Chapter 11 Reorganization Plan; draft proposed Order Granting same.	SD	0.80	\$170.00	\$136.00
10/12/2023	Draft two Ballots, one for Classes 1-15 and one for Class 16 General Unsecured Creditors.	SD	1.60	\$170.00	\$272.00
10/12/2023	Draft Order Conditionally Approving Disclosure Statement and Setting a combined Hearing on Final Approval of the Disclosure Statement and Confirmation of the Chapter 11 Reorganization Plan.	SD	1.20	\$170.00	\$204.00
10/12/2023	Review 36 page Plan with Abram Carls and discuss Keystone Savings Bank's Perspective on the proposed reorganizational plan.	JP	2.20	\$575.00	\$1,265.00
10/12/2023	Review and revise ballots for Plan of Reorganization.	JP	0.50	\$575.00	\$287.50
10/12/2023	Review and Revise Motion to Conditionally Approve Disclosure Statement; Motion to Consolodate Hearings on Approval of Disclosure Statement and Plan Confirmation; Orders Approving the Motions.	JP	0.50	\$575.00	\$287.50
10/12/2023	Review and revise Order Approving and the Motion to Set Deadline for Creditors to File their Proofs of Claim given the Amended Schedules filed on October 12, 2023.	JP	0.40	\$575.00	\$230.00

10/12/2023	Participate in meeting with Dennis Bruce and Ron Martin to discuss Hearing on Motion to Extend the automatic stay set for October 18, 2023.	JP	0.50	\$575.00	\$287.50
10/12/2023	Respond to e-mails from Attorney Evan Moscov who represents Green Note regarding extension of time to file responsive pleading to the Adversary seeking an extension of the Stay and who the witnesses could be at the hearing set for October 18, 2023.	JP	0.20	\$575.00	\$115.00
10/12/2023	Telephone call to Dennis Bruce to discuss hearing next week to extend the stay.	JP	0.20	\$575.00	\$115.00
10/13/2023	Email Todd Vandenberg to see if we need to file the attachments with the Amended MORs, or just the reports themselves. (No Charge).	LW	0.10	\$0.00	\$0.00
10/13/2023	Draft Notice of First Interim Application for Compensation for Debtor's Accountant.	LW	0.10	\$170.00	\$17.00
10/13/2023	Check the Motion to Pay Prepetition Wages for Dennis and Candace Bruce per Attorney Austin Peiffer's request. (No Charge)	AT	0.20	\$0.00	\$0.00
10/13/2023	Update the Liquidation Analysis for the correct Priority Wage Claims for Dennis and Candace Bruce per Attorney Austin Peiffer's request.	AT	0.20	\$170.00	\$34.00
10/13/2023	Draft e-mail to Janet Reasoner at the US Trustee's Office regarding the draft Motion to Set Bar Date for Non-Governmental Units to File a Proof of Claim and Motion for Conditional Approval of Disclosure Statement and to Combine Hearings on Final Approval of the Disclosure Statement and Confirmation of the Chapter 11 Reorganization Plan; receive and review reply.	SD	0.10	\$170.00	\$17.00
10/13/2023	Prepare September MOR and attachments.	LW	0.50	\$170.00	\$85.00
10/13/2023	Circulate file stamped order on MLS stay and cancelling 10/13 hearing. (No Charge).	MP	0.10	\$0.00	\$0.00
10/13/2023	Prepare and send Amended MOR for July to Dennis Bruce via Dropbox Sign for his e-signature. (No Charge).	LW	0.20	\$0.00	\$0.00
10/13/2023	Prepare and send Amended MOR for August to Dennis Bruce via Dropbox Sign for his e-signature. (No Charge).	LW	0.20	\$0.00	\$0.00
10/13/2023	Email Dennis Bruce to advise I have sent him the amended MORS for July & August via Dropbox Sign for his e-signatures. (No Charge).	LW	0.10	\$0.00	\$0.00
10/13/2023	Email Todd Shores to request the AR spreadsheet for September, and ask if the MOR attachments have changed at all with the amended MORs. (No Charge).	LW	0.10	\$0.00	\$0.00
10/13/2023	Draft Proposed Order Granting First Interim Application for Compensation for Debtor's Accountant.	LW	0.10	\$170.00	\$17.00

10/13/2023	Email drafted Notice of First Interim Application for Compensation for Debtor's Accountant and corresponding Proposed Order to Attorney Joseph Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
10/13/2023	Upload signed Amended MORs for July & August to NetDocuments. (No Charge).	LW	0.10	\$0.00	\$0.00
10/13/2023	Telephone call to Dennis Bruce and Todd Shores regarding the truthfulness of the representations made to them by the Merchant Cash Advance lenders to determine whether there were FTC violations.	JP	0.30	\$575.00	\$172.50
10/13/2023	Research cases regarding potential violations of the FTC by the Merchant Cash Advance lenders to explore potential claim against them on behalf of Debtor.	JP	0.80	\$575.00	\$460.00
10/13/2023	Draft e-mail to client regarding the questions raised by the research regarding potential FTC violations by Merchant Cash Advance lenders.	JP	0.20	\$575.00	\$115.00
10/16/2023	Draft Amendment to Mailing Matrix.	LW	0.50	\$170.00	\$85.00
10/16/2023	Email drafted Amendment to Mailing Matrix to Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
10/16/2023	Call with Attorney Joe Peiffer discussing disclosure statement and attachments, plan, final DIP budget, and timing on getting these filed.	AP	0.30	\$350.00	\$105.00
10/16/2023	Email September MOR and its attachments to Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
10/16/2023	Review Disclosure Statement, make changes as needed, prepare Disclosure Statement Schedules 1-4, and convert the Disclosure Statement and the Chapter 11 Plan to pdf for filing.	LW	1.50	\$170.00	\$255.00
10/16/2023	Email to Alex Tvedte assigning him task to research email correspondence on insurance loss payee rights involving Deere.	AP	0.10	\$350.00	\$35.00
10/16/2023	Review and edit disclosure statement.	AP	1.40	\$350.00	\$490.00
10/16/2023	Locate email chains for Attorney Austin Peiffer regarding loss payee information. (No Charge)	AT	0.70	\$0.00	\$0.00
10/16/2023	Edit cash flow projection so it displays better when printed.	AP	0.20	\$350.00	\$70.00
10/16/2023	Review plan, disclosure statements, and attachments before they're sent to client's principals for their final review.	AP	0.30	\$350.00	\$105.00
10/16/2023	Work on Cash Flow for DIP budget and the Plan Feasibility Analysis.	SD	1.20	\$170.00	\$204.00
10/16/2023	Begin reviewing Chapter 11 Reorganization Plan.	SD	0.20	\$170.00	\$34.00
10/16/2023	Email current drafts of the Disclosure Statement and Plan to	LW	0.10	\$0.00	\$0.00

Dennis Bruce and Todd Shores for review. (No Charge).					
10/16/2023	Teams Meeting with Attorney Austin Peiffer regarding preparing the Schedules to the Disclosure Statement. (No Charge).	LW	0.10	\$0.00	\$0.00
10/16/2023	Email Plan, Disclosure Statement, and attachments to Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
10/16/2023	Finalize drafting of Disclosure Statement with schedules to be attached.	JP	1.00	\$575.00	\$575.00
10/17/2023	Email Attorney Austin Peiffer and Attorney Joseph Peiffer to follow up on Amendment to Mailing Matrix. (No Charge).	LW	0.10	\$0.00	\$0.00
10/17/2023	Email Attorney Austin Peiffer to follow up on the September MOR. (No Charge).	LW	0.10	\$0.00	\$0.00
10/17/2023	Email Attorney Joseph Peiffer and Attorney Austin Peiffer to follow up on the Motion to Set Bar Date for Non-Governmental Units to File POCs. (No Charge).	LW	0.10	\$0.00	\$0.00
10/17/2023	Draft motion to shorten plan and disclosure statement bar dates. (No Charge).	AP	0.70	\$0.00	\$0.00
10/17/2023	Meet with Attorney Joseph Peiffer, Attorney Austin Peiffer, and Paralegal Susan Daves to discuss final changes to the Chapter 11 Plan of Reorganization and Disclosure Statement and to discuss timeline of filing all documents.	LW	1.10	\$170.00	\$187.00
10/17/2023	Meeting with Attorney Joe Peiffer, Susan Daves, and Leah Watson performing final review of and edits to September monthly operating report, Chapter 11 plan, disclosure statement, motion to set bar date for amended non-governmental unit claims, motion to conditionally approve disclosure statement and corresponding proposed order, motion to shorten bar dates for objections to plan and disclosure statement and corresponding proposed order, and other documents.	AP	2.20	\$350.00	\$770.00
10/17/2023	Send September MOR to Dennis Bruce via Dropbox Sign for his review and e-signature. (No Charge).	LW	0.10	\$0.00	\$0.00
10/17/2023	Prepare September MOR for filing.	LW	0.10	\$0.00	\$0.00
10/17/2023	Draft Proposed Order Granting Motion to Set Bar Date for Non-Governmental Units to File POCs.	LW	0.10	\$170.00	\$17.00
10/17/2023	Prepare E-Signature Cover Page for Dennis Bruce for the Chapter 11 Plan of Reorganization.	LW	0.10	\$170.00	\$17.00
10/17/2023	Send Chapter 11 Plan of Reorganization to Dennis Bruce via Dropbox Sign for his review and e-signature. (No Charge).	LW	0.10	\$0.00	\$0.00
10/17/2023	Prepare updated Schedule 4 to the Disclosure Statement.	LW	0.10	\$170.00	\$17.00
10/17/2023	Review and edit Chapter 11 Reorganization Plan,	SD	3.80	\$0.00	\$0.00

	Disclosure Statement, Liquidation Analysis, Motion for Conditional Approval of Disclosure Statement and to Combine Hearings on Final Approval of Disclosure Statement and Confirmation of Plan, Motion to Set Bar Date for Non-Governmental Units to File Proofs of Claim; Motion to Shorten Time to Object; and Order Conditionally Approving Disclosure Statement and Fixing Time for Filing Acceptances or Rejections of Plan, Combined with Notice Thereof. (No Charge).				
10/17/2023	Prepare Chapter 11 Plan of Reorganization to be signed by Dennis Bruce. (No Charge).	LW	0.10	\$0.00	\$0.00
10/17/2023	Draft Proposed Order Granting Motion to Shorten Plan & Disclosure Statement Bar Dates.	LW	0.10	\$170.00	\$17.00
10/17/2023	Email drafted Proposed Order Granting Motion to Shorten Plan & Disclosure Statement Bar Dates to Attorney Joseph Peiffer and Attorney Austin Peiffer for review. (No Charge).	LW	0.10	\$0.00	\$0.00
10/17/2023	Upload Chapter 11 Plan of Reorganization signed by Dennis Bruce to NetDocuments. (No Charge).	LW	0.10	\$0.00	\$0.00
10/17/2023	Call with Keystone Savings Bank's counsel discussing proposing final DIP budget and the status of the plan and disclosure statement.	AP	0.20	\$350.00	\$70.00
10/17/2023	Draft motion for final DIP financing authorization.	AP	0.30	\$350.00	\$105.00
10/17/2023	Draft Motion for Fifth Interim and Final Orders regarding Debtor-in-Possession Financing; draft proposed Order Granting same.	SD	0.80	\$170.00	\$136.00
10/17/2023	Finalize proposed final DIP budget exhibit and send to Unsecured Creditors Committee's counsel to determine whether the committee is interested in authorizing this.	AP	0.20	\$350.00	\$70.00
10/18/2023	Review and revise Order Conditionally Approving Disclosure Statement and Fixing Time for Filing Acceptances or Rejections of Plan, Combined with Notice Thereof, Ballot for Class 1 - 15 and Ballot for Class 16.	SD	0.60	\$170.00	\$102.00
10/18/2023	Email Attorney Joseph Peiffer to follow up the First Interim Application for Compensation for Debtor's Accountant. (No Charge).	LW	0.10	\$0.00	\$0.00
10/18/2023	Telephone call from Carolyn Striegel at Wells Fargo Bank regarding establishing D-I-P account with a control agreement.	JP	0.10	\$575.00	\$57.50
10/18/2023	Draft Joint Motion to Establish D-I-P Account at Wells Fargo Bank with a Control Agreement.	JP	0.30	\$575.00	\$172.50
10/18/2023	Draft proposed Consent Order Granting Motion to Establish D-I-P Account at Wells Fargo Bank.	JP	0.10	\$575.00	\$57.50
10/18/2023	Draft e-mails to various parties regarding establishment of second Debtor-In-Possession Account at Wells Fargo Bank.	JP	0.20	\$575.00	\$115.00

10/18/2023	Telephone calls to Abram Carls and Todd Vandenberg regarding establishment of Debtor-In-Possession Account at Wells Fargo Bank.	JP	0.20	\$575.00	\$115.00
10/18/2023	Proofread Notice of Schedule Amendments and prepare Doc 235 for mailing.	MP	0.10	\$170.00	\$17.00
10/18/2023	Review and approve notice of amended schedules and bar date for new or amended proofs of claim.	AP	0.10	\$350.00	\$35.00
10/18/2023	Finalize and file Doc 252, Notice of Schedule Amendments, and submit Docs 235 and 252 to be served via certificateofservice.com	MP	0.30	\$170.00	\$51.00
10/18/2023	Meeting with Attorney Joe Peiffer discussing case status, pending tasks, and who will be responsible for accomplishing what tasks.	AP	0.60	\$350.00	\$210.00
10/18/2023	Take call from the clerk of court discussing scheduling confirmation hearing.	AP	0.20	\$350.00	\$70.00
10/18/2023	Receive and review U.S. Trustee's Objection to Debtor's Motion to Shorten Time to Object to Chapter 11 Reorganization Plan.	SD	0.10	\$170.00	\$17.00
10/18/2023	Conference with Attorneys Joe Peiffer and Austin Peiffer regarding the U.S. Trustee's Objection to Debtor's Motion to Shorten Time to Object to Chapter 11 Reorganization Plan.	SD	0.10	\$170.00	\$17.00
10/18/2023	Meeting with Attorney Austin Peiffer discussing case status, pending tasks, and who will be responsible for accomplishing what tasks.	JP	0.60	\$575.00	\$345.00
10/18/2023	Email to counsel for the United States Trustee, Keystone Savings Bank, and the Unsecured Creditors Committee discussing proposal to withdraw most of the motion to shorten bar dates for plan and disclosure statement objections.	AP	0.30	\$350.00	\$105.00
10/18/2023	Email to Unsecured Creditors Committee's counsel discussing proposed final DIP budget, agreement, motion, and order.	AP	0.10	\$350.00	\$35.00
10/18/2023	Respond to email from the Unsecured Creditors Committee's counsel discussing withdrawing the joint motion to lift the stay for Keystone Savings Bank or continue next week's hearing.	AP	0.10	\$350.00	\$35.00
10/18/2023	Respond to email from client's CFO discussing earn-out payment to liquidating trust for the benefit of unsecured creditors.	AP	0.20	\$350.00	\$70.00
10/18/2023	Respond to email from ECICOG's attorney discussing plan confirmation timeline.	AP	0.10	\$350.00	\$35.00
10/18/2023	Respond to email from client's CFO discussing final payment to a critical vendor that is no longer needed.	AP	0.10	\$350.00	\$35.00

10/18/2023	Email to client's principal discussing status of Deere trailer insurance claim and the collateral that ended up at an ex-employee's house.	AP	0.20	\$350.00	\$70.00
10/18/2023	Follow up with client's insurer discussing loss payees and joint checks for insurance claims.	AP	0.10	\$350.00	\$35.00
10/18/2023	Organize and supplement this afternoon's notes on the case status with notes on potential objections to the plan and disclosure statement.	AP	0.20	\$350.00	\$70.00
10/18/2023	Revise final DIP motion, final DIP agreement, and proposed final DIP order and circulate to counsel for Keystone Savings Bank and the Unsecured Creditors Committee with comments.	AP	0.70	\$350.00	\$245.00
10/18/2023	Draft request for default against defendants who have not appeared in the injunction adversary.	AP	0.50	\$350.00	\$175.00
10/18/2023	Telephone call from Abram Carls to review status of plan, DIP account, DIP Financing.	JP	0.20	\$575.00	\$115.00
10/18/2023	Place telephone call to Certificateofservice.com regarding COS for Doc 252. Receive and file same. (No Charge).	MP	0.10	\$0.00	\$0.00
10/19/2023	Case status update meeting with Attorney Joe Peiffer, client's principals, and Keystone Savings Bank representatives.	AP	0.70	\$350.00	\$245.00
10/19/2023	Meeting with Dennis Bruce, Todd Shores, Travis Armstrong, Abe Carls and Austin Peiffer regarding status of case and how to move it forward.	JP	0.70	\$575.00	\$402.50
10/19/2023	Gather information regarding the lease payments for the six leases that were assumed and confirm the payment amounts compared with the amounts that MLS states were paid. Send all of that information to Attorney Austin Peiffer for review.	AT	0.90	\$170.00	\$153.00
10/19/2023	Call with Attorney Joe Peiffer and the Unsecured Creditors Committee's counsel discussing plan status and next week's hearings.	AP	0.80	\$350.00	\$280.00
10/19/2023	Call with Attorney Austin Peiffer and the Unsecured Creditors Committee's counsel discussing plan status and next week's hearings.	JP	0.80	\$575.00	\$460.00
10/19/2023	Type up and elaborate on notes from call with Attorney Joe Peiffer and Unsecured Creditors Committee's counsel.	AP	0.30	\$350.00	\$105.00
10/19/2023	Draft assignment of JD Trailer insurance claim to Dennis Bruce. (No Charge).	JP	0.40	\$0.00	\$0.00
10/19/2023	Telephone call to Janet Reasoner regarding status of case and moving forward.	JP	0.20	\$575.00	\$115.00
10/19/2023	Review Keystone State Bank's proposed account control agreement with Wells Fargo for the Debtor-in-Possession	AP	0.10	\$350.00	\$35.00

lockbox account.					
10/19/2023	Send deposit control agreement with corrected debtor address to Keystone Savings Bank's counsel and to client to forward to Wells Fargo.	AP	0.10	\$350.00	\$35.00
10/19/2023	Respond to email from Ally Bank's representatives discussing listing collateral values separately on the plan.	AP	0.10	\$350.00	\$35.00
10/19/2023	Review, edit, and approve first fee application for client's accountant and associated documents, pending final confirmation of the bill and amount.	AP	0.20	\$350.00	\$70.00
10/20/2023	Email to GreenState's attorney confirming the consensual stay relief motion is acceptable and urging speed in submitting the documents and removing the property.	AP	0.10	\$350.00	\$35.00
10/20/2023	Email to Attorney Joe Peiffer summarizing developments related to today's hearing this morning and outlining the direction I think we should ask the Court to take.	AP	0.20	\$350.00	\$70.00
10/20/2023	Email TrueNorth to get information regarding Proof of Insurance for Attorney Austin Peiffer.	AT	0.10	\$170.00	\$17.00
10/20/2023	Call TrueNorth to gather information regarding BDC's Proof of Insurance per Attorney Austin Peiffer's request. Left voicemail for Molly Kinney.	AT	0.10	\$170.00	\$17.00
10/20/2023	Call TrueNorth again regarding information for BDC's Proof of Insurance per Attorney Austin Peiffer's request. Left voicemail for Will Teubel.	AT	0.10	\$170.00	\$17.00
10/20/2023	Respond to client's CFO's inquiry about necessity of obtaining insurance loss payee joint check information for Deere given that its other concerns have been addressed.	AP	0.20	\$350.00	\$70.00
10/20/2023	Email to client's insurance agent explaining information needed to reassure Deere that it will be a joint payee on any future insurance checks for its collateral.	AP	0.20	\$350.00	\$70.00
10/20/2023	Call Todd Shores to check in regarding the correct bill for their accountant, but no answer. (No Charge).	LW	0.10	\$0.00	\$0.00
10/20/2023	Email Todd Shores a copy of the accountant bill we have to ensure it is the correct version. (No Charge).	LW	0.10	\$0.00	\$0.00
10/20/2023	Emails to GreenState Credit Union's attorney and client's principals coordinating collateral pickup.	AP	0.10	\$350.00	\$35.00
10/20/2023	Respond to Keystone Savings Bank's counsel's email discussing final DIP documents.	AP	0.20	\$350.00	\$70.00
10/20/2023	Review emails to determine which creditors have not yet picked up their equipment from the Virginia lot.	LW	0.30	\$170.00	\$51.00
10/20/2023	Email Manchester Leasing's attorney, Terry Gibson, to request a status update on Manchester Leasing picking up the equipment located on the Virginia lot.	LW	0.10	\$170.00	\$17.00

10/20/2023	Hearing on Motion to Continue Hearing on KSB Motion to Lift Stay and discussion of other scheduling matters.	JP	0.60	\$575.00	\$345.00
10/20/2023	Telephone call with Dennis Bruce and Austin Peiffer to discuss the results of the hearing on the Motion to Continue the Hearing on the KSB Motion to Lift Stay.	JP	0.40	\$575.00	\$230.00
10/20/2023	Hearing on Motion to Continue Hearing on KSB Motion to Lift Stay and discussion of other scheduling matters. (No Charge).	AP	0.60	\$0.00	\$0.00
10/20/2023	Telephone call with Dennis Bruce and Joseph Peiffer to discuss the results of the hearing on the Motion to Continue the Hearing on the KSB Motion to Lift Stay. (No Charge).	AP	0.40	\$0.00	\$0.00
10/20/2023	Review Ally Motion to Lift Stay and Motion for Adequate Protection.	JP	0.30	\$575.00	\$172.50
10/20/2023	Draft e-mail to client regarding Ally Motion to Lift Stay and Motion for Adequate Protection.	JP	0.20	\$575.00	\$115.00
10/20/2023	Review Ally Bank's stay relief and adequate protection motion.	AP	0.10	\$350.00	\$35.00
10/20/2023	Call with Keystone Savings Bank's counsel discussing amending final DIP documents and client's position on committee fees.	AP	0.20	\$350.00	\$70.00
10/21/2023	Draft motion for default judgments against defaulting defendants in the injunction adversary.	AP	0.30	\$350.00	\$105.00
10/21/2023	Email to Deere's attorney discussing definition of loss payee and requesting confirmation that the noted defaults have been cured.	AP	0.10	\$350.00	\$35.00
10/23/2023	Email Todd Shores to advise that the statement he received from BerganKDV does not include specific time entries, only a general overview of charges. (No Charge).	LW	0.10	\$0.00	\$0.00
10/23/2023	Email BDC Group inc.'s accountant, Joe Benter, to request a current invoice that includes specific time entries rather than an overview of payments and charges.	LW	0.10	\$170.00	\$17.00
10/23/2023	Draft e-mail to UCC counsel, Abram Carls and Austin Peiffer regarding setting up stipulation of facts and briefing to allow Judge Collins to rule on question regarding whether Keystone Savings Bank has a security interest in the bankruptcy avoidance actions securing its pre-petition indebtedness.	JP	0.10	\$575.00	\$57.50
10/23/2023	Email to Keystone Savings Bank's attorney discussing whether a prepetition security interest in general intangibles encompasses Chapter 5 avoidance actions.	AP	0.60	\$350.00	\$210.00
Services Subtotal					\$97,493.75

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	08/15/2023	Copy expense for printing letter and email to be mailed to Wes Huisinga with insurance check.	4.00	\$0.50	\$2.00
Expense	08/15/2023	Postage expense for mailing letter, email, and insurance check to Wes Huisinga.	1.00	\$0.66	\$0.66
Expense	08/15/2023	Mailing charge for noticing Doc. 159.	1.00	\$7.28	\$7.28
Expense	08/16/2023	Mail out Notice of Chapter 11 Bankruptcy (Doc. 48), Notice of Application to Employ (Doc. 39), and Notice of Motion to Establish Notice Procedures (Doc. 40) to creditor Efrain Jovel.	1.00	\$0.66	\$0.66
Expense	08/17/2023	Mailing Service Fee for mailing Notice of First Interim Application for Compensation for Debtor's Attorney and Notice of Lease Rejection and Opportunity to Object to the Master Service List via CertificateofService.com	1.00	\$7.28	\$7.28
Expense	08/21/2023	Incoming wire fee.	1.00	\$10.00	\$10.00
Expense	08/30/2023	Incoming wire fee.	1.00	\$10.00	\$10.00
Expense	09/05/2023	Mail out Form 309F1 Notice of Bankruptcy to creditor Leonardo Meza Jr.	1.00	\$0.66	\$0.66
Expense	09/06/2023	Incoming wire fee.	1.00	\$10.00	\$10.00
Expense	09/15/2023	File the Complaint for Injunctive Relief for client in a new Adversary Case: 23-ap-09042.	1.00	\$350.00	\$350.00
Expense	09/15/2023	Copy expense for printing Notice of Motion to Assume & Reject MLS Leases and Notice of Unopposed Motion to Reject Unexpired Hiawatha Properties Lease to be mailed to the Master Service List.	12.00	\$0.20	\$2.40
Expense	09/15/2023	Postage expense for mailing Notice of Motion to Assume & Reject MLS Leases and Notice of Unopposed Motion to Reject Unexpired Hiawatha Properties Lease to the Master Service List.	6.00	\$0.66	\$3.96
Expense	09/15/2023	Mail out the Complaint Injunctive Relief, Emergency Motion for Temporary Restraining Order with Attachments, and Memorandum Supporting Motion for Temporary Restraining Order to the locations listed on the Certificates of Service in these documents.	341.00	\$0.20	\$68.20
Expense	09/15/2023	Mail the Complaint for Injunctive Relief, Emergency Motion for Temporary Restraining Order with attachments, and the Memorandum Supporting Motion for Temporary Restraining Order via the USPS to the defendants in Adversary Case No. 23-09042.	1.00	\$28.05	\$28.05
Expense	09/18/2023	Print out the Summons for the Adversary Case to be mailed	11.00	\$0.20	\$2.20

to the appropriate recipients.

Expense	09/18/2023	Mail the Summons out via the USPS to the appropriate recipients in the Adversary Case.	11.00	\$0.66	\$7.26
Expense	09/19/2023	Copy expense for printing Notice of Motion to Terminate or Waive Exclusivity to be mailed to the Master Service List.	6.00	\$0.20	\$1.20
Expense	09/19/2023	Postage expense for mailing Notice of Motion to Terminate or Waive Exclusivity to the Master Service List. (No Charge).	6.00	\$0.66	\$3.96
Expense	09/20/2023	Mail out Adversary Complaint (Doc. 1), Motion for Temporary Restraining Order (Doc. 2), Memorandum Supporting Motion for Temporary Restraining Order (Doc. 3), and Summons in an Adversary Proceeding (Doc. 4) to the Registered Agent for Sheets Sterling, Inc. in the Adversary Case no. 23-09042.	1.00	\$1.38	\$1.38
Expense	09/20/2023	Print and mail out Adversary Complaint (Doc. 1), Motion for Temporary Restraining Order (Doc. 2), Memorandum Supporting Motion for Temporary Restraining Order (Doc. 3), and Summons in an Adversary Proceeding (Doc. 4) to the Registered Agent for Sheets Sterling, Inc. in the Adversary Case no. 23-09042.	17.00	\$0.20	\$3.40
Expense	09/22/2023	Incoming wire fee.	1.00	\$10.00	\$10.00
Expense	09/29/2023	Incoming wire fee.	1.00	\$10.00	\$10.00
Expense	10/12/2023	Filing Fee for filing the Amended Schedules (A/B, D, E/F, G, H, Summary of Assets and Liabilities, and SOFA with attachments).	1.00	\$32.00	\$32.00
Expense	10/13/2023	Incoming wire fee.	1.00	\$10.00	\$10.00
Expense	10/17/2023	PACER research charges.	1.00	\$1.70	\$1.70
Expense	10/18/2023	Mailing Service Fee: Mailing of Docs 235 and 252 to whole matrix.	1.00	\$5,722.17	\$5,722.17
Expense	10/20/2023	Incoming wire fee.	1.00	\$10.00	\$10.00
Expenses Subtotal				\$6,316.42	

Time Keeper	Position	Quantity	Rate	Total
Yara Halloush	Attorney	1.4	\$405.00	\$567.00
Yara Halloush	Attorney	0.9	\$202.50	\$182.25
Yara Halloush	Attorney	0.4	\$0.00	\$0.00
Austin Peiffer	Attorney	141.7	\$350.00	\$49,595.00
Austin Peiffer	Attorney	4.8	\$0.00	\$0.00

Joseph Peiffer	Attorney	62.0	\$575.00	\$35,650.00
Joseph Peiffer	Attorney	5.0	\$200.00	\$1,000.00
Joseph Peiffer	Attorney	7.1	\$0.00	\$0.00
Joseph Peiffer	Attorney	0.1	-\$575.00	-\$57.50
Susan Daves	Senior Paralegal	6.7	\$170.00	\$1,139.00
Susan Daves	Senior Paralegal	3.8	\$0.00	\$0.00
Mike Peiffer	Non-Attorney	5.1	\$170.00	\$867.00
Mike Peiffer	Non-Attorney	2.6	\$0.00	\$0.00
Alex Tvedte	Legal Assistant	31.8	\$170.00	\$5,406.00
Alex Tvedte	Legal Assistant	14.4	\$0.00	\$0.00
Leah Watson	Paralegal	18.5	\$170.00	\$3,145.00
Leah Watson	Paralegal	57.2	\$0.00	\$0.00
			Subtotal	\$103,810.17
			Total	\$103,810.17

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
2512	10/24/2023	\$103,810.17	\$0.00	\$103,810.17
			Outstanding Balance	\$103,810.17
			Total Amount Outstanding	\$103,810.17

Trust Account

Date	Type	Notes	Matter	Receipts	Payments	Balance
03/27/2023	Wire	Wire from BDC Group, Inc. for trust deposit.			\$25,000.00	\$25,000.00
04/14/2023		Payment for bill #2305 (T2984).	6394.00001-BDC - Chapter 11	\$7,498.50		\$17,501.50

Bankruptcy				
04/18/2023	Wire	Wire from BDC Group, Inc. for trust deposit.	\$7,498.50	\$25,000.00
05/15/2023		Payment for bill #2344 (T3010).	6394.00001-BDC - Chapter 11 Bankruptcy	\$4,051.00
05/22/2023	Wire Transfer	Wire transfer from BDC Group, Inc. for trust deposit.	\$78,001.00	\$98,950.00
06/13/2023		Payment for bill #2377 (ACH).	6394.00001-BDC - Chapter 11 Bankruptcy	\$28,313.50
07/28/2023	Wire	Wire from BDC Group for trust deposit.	\$10,000.00	\$80,636.50
08/04/2023	Wire	Wire from BDC Group Inc for trust deposit.	\$10,000.00	\$90,636.50
08/11/2023	Wire	Wire from BDC Group, Inc. for trust deposit.	\$10,000.00	\$100,636.50
08/18/2023	Wire	Wire from BDC Group, Inc. for trust deposit.	\$10,000.00	\$110,636.50
08/24/2023	Wire	Wire from BDC Group, Inc. for trust deposit.	\$10,000.00	\$120,636.50
08/30/2023	Wire	Wire from BDC Group, Inc. for trust deposit.	\$10,000.00	\$130,636.50
09/06/2023	Wire	Wire from BDC Group, Inc. for trust deposit.	\$10,000.00	\$140,636.50
09/08/2023		Payment for bill #2435 (T3103).	6394.00002-BDC - Postpetition	\$68,064.89
09/22/2023	Wire	Wire from BDC Group, Inc. for trust deposit.	\$10,000.00	\$82,571.61
09/29/2023	Wire	Wire from BDC Group, Inc. for trust deposit.	\$10,000.00	\$92,571.61
10/13/2023	Wire	Wire from BDC Group, Inc. for trust deposit.	\$10,000.00	\$102,571.61
10/20/2023	Wire	Wire from BDC Group for trust deposit.	\$10,000.00	\$112,571.61
10/27/2023	Wire	Wire from BDC group for trust deposit.	\$10,000.00	\$122,571.61
10/31/2023	Wire	Wire from BDC Group, Inc. for trust deposit.	\$10,000.00	\$132,571.61

Trust Account Balance	\$132,571.61
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Please make all amounts payable to: Ag & Business Legal Strategies

Payment is due upon receipt.